

Local Plan: Development Management Policies

All representations that were received during the Regulation 19 consultation sorted by respondent name.



Notes

This document contains two reports. The first report lists the comments that were received in the “Online questionnaire: general comments about the plan or process”. This questionnaire included six questions as follows:

Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: Development Management Policies (2021) is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan is listed in the Plan in the green boxes headed key evidence under each policy.

Do you agree that the evidence used for the Proposed Submission Local Plan: Development Management Policies (2021) is adequate, up-to-date and relevant?

Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole is legally compliant?

Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

Question 3: Soundness

Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole is sound?

Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole has complied with the duty to cooperate?

Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

Question 5: The content of the plan

Question 5 of the paper version of this questionnaire asks you to make comments about particular paragraphs, policies or sections in the Proposed Submission Local Plan: Development Management Policies.

If you are commenting online, we invite you use the [Online questionnaire: specific policies, sections and paragraphs](#) (this link will open in a new window) to give us your views on specific policies, paragraphs and sections in the plan.

Question 6: Any other comments?

Do you have any other comments that have not been covered by the previous questions?

Please note, comments can only be considered where they relate the plan or documents that have been produced in support of the plan.

The second report lists the comments that were received in the “[Online questionnaire: specific policies, sections and paragraphs](#)”. This questionnaire asked respondents to tell us their views on the policies, paragraphs and sections in the plan.

Regulation 19 Local Plan: Development Management Policies, all representations for "Online questionnaire: general comments about the plan or process" in respondent order.

Comment ID	LPDM21A/44
Respondent ID	8993793
Respondent Name	Berkeley Homes Southern Ltd. (Sir or Madam)
Agent Name	Quod (Matt Briant)
Section	Question 6: Any other comments?
Answer	
Comment	<p>1 Introduction</p> <p>1.1 Please treat this letter as a response to the Guildford Borough Council ('GBC' or 'the Council') Regulation 19 consultation on the Draft Guildford Borough Local Plan: Development Management Policies ('GLP' or 'the draft Local Plan') on behalf of Berkeley Homes (Southern) Ltd ('BHSL').</p> <p>1.2 BHSL own land at Effingham, which is being used for the relocation and redevelopment of the Howard of Effingham school, and associated housing to help fund the development of the new school. There is an extant hybrid planning permission, which was granted consent on appeal by the Secretary of State (SoS) in 2018 (hereafter referred to as the '2018 permission') for the new school and housing development at Lower Road, Effingham (GBC ref. 14/P/02109) (PINS ref: APP/Y3615/W/16/3151098).</p> <p>1.3 Several reserved matters applications have been submitted and approved pursuant to the scheme, and two further applications are currently under consideration by GBC for additional enabling housing to provide funding for the delivery of the new school (GBC refs. 21/P/01306 and 21/P/01283).</p> <p>1.4 Our representation concerns draft policies H7 (Review Mechanism) and H8 (First Homes) from the Housing Chapter, and draft policy P6/P7 (Biodiversity in New Developments) from the Protecting chapter.</p>
Files	

Comment ID	LPDM21A/35
Respondent ID	38182209
Respondent Name	Blackwell Farm Ltd & University of Surrey
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Question 1: The evidence base and submission documents
Answer	
Comment	<p>Guildford Borough Council – LPDMP & Stage 1 CIL Viability Assessment – Final Report (Dec 2021)</p> <p>Our client notes that the viability assessment uses benchmark land values and construction costs that are very low. This is a concern as it leads to potentially inflated residual land values and therefore affects the validity of the overall viability assessment. This could lead to policy requirements not being capable of being met in full.</p> <p>Please do not hesitate to contact me if you wish to discuss these comments.</p>
Files	

Comment ID	LPDM21A/34
Respondent ID	38182209
Respondent Name	Blackwell Farm Ltd & University of Surrey
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Question 6: Any other comments?
Answer	
Comment	<p>On behalf of our clients, Blackwell Park Ltd and the University of Surrey, please see below some comments on the above consultation.</p>

	Our clients are broadly supportive of the policies set out in the Regulation 19 document, and have the following comments on a selection of the policies.
Files	
Comment ID	LPDM21A/40
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Question 6: Any other comments?
Answer	
Comment	<p>1. Introduction</p> <p>1.1. This representation has been prepared by Savills, on behalf of Bloor Homes Ltd in response to Guildford Borough Council's (GBC) Regulation 19 Proposed Submission Local Plan: Development Management Policies (LPDMP).</p> <p>1.2. The Local Plan: Strategy and Sites (2019) (LPSS) document sets out GBC's vision, objectives and approaches to development and the location of key sites in the area between now and 2034. The LPDMP is Part 2 of the Local Plan and includes detailed policies to be considered when determining planning applications.</p> <p>1.3. Bloor Homes is the UK's largest privately-owned housebuilder and celebrated its 50th anniversary year in 2019. It constructs homes nationally and has many site interests in the South East. Bloor Homes recognises Guildford Borough as a significant market for housebuilding and wishes to contribute to addressing the housing needs of Borough.</p> <p>1.4. It has a number of interests in the Borough, and at the time of writing, has a live application for the approval of reserved matters relating to up to 100 homes at Land at May and Juniper Cottages, Ash Green (LPA ref: 21/P/01211). The site is also part of the allocation under Policy A31 in the adopted LPSS for 1,750 homes.</p>

Land at May and Juniper Cottages, Ash Green

1.5. It is Bloor Homes' intention, subject to the approval of reserved matters, to commence works on site in 2022. The anticipated adoption of the DMP is March 2023, with submission to the Secretary of State in May/June 2022, and Examination in September/October 2022.1

1.6. It may be the case that approval of reserved matters is obtained before the DMP is adopted, however GBC may start providing weight to the policies in decision-making following the submission of the LPDMP and so the wording of the draft policies may become relevant in the coming months.

1.7. Therefore, it is hoped that these representations are considered carefully by GBC to ensure that the draft policies do not present unreasonable challenges or complications to the planning process. Policies must not compromise the delivery of the site allocations in the LPSS or prevent the approval of reserved matters related to extant planning permissions.

1.8. Furthermore, Bloor Homes is likely to have interests in new sites in the Borough in the future and so the provision of reasonable, clear and specific policies to help guide applications and reduce uncertainty is very important to their business.

Structure of Representation

1.9. Bloor Homes has reviewed the policies in the LPDMP. A list has been provided of the policies Bloor Homes has no comment on in the next section of this representation.

1.10. The rest of the document sets out Bloor Homes' comments and objections to relevant policies. Where Bloor Homes has concerns or object to the policies as drafted, alternative wording is suggested where appropriate, which the next iteration of the policy document should consider.

2. Representations

2.1. The LPDMP includes planning policies relating to various topics, which would become the principal consideration for the decision maker when determining planning applications.

2.2. Bloor Homes has not provided comment on a number of policies and these are listed below. However, GBC should consider whether all the policies as drafted are useful and necessary for decision making, and do not just repeat that which is already stated in LPSS, in the National Planning Policy Framework (NPPF), Planning Practice Guidance or legislation. Policies should also be unambiguous, clear and concise.

2.3. Guildford Borough Council (GBC) need to consider the objectives of this Plan and whether the policies it contain support an effective and efficient decision making process. At present, the document repeats national guidance and policies in the adopted LPSS (2019). It should be as concise as possible, as specified in the PPG (002). Development in the Borough must be guided by these documents anyway, thus repeating the policies serves only to complicate decision making.

2.4. Policies which Bloor Homes has no comment:

1. Policy H5 Housing Extensions and Alterations including Annexes
2. Policy H6: Housing Conversion and Sub-division
3. Policy E11: Animal Related Development
4. Policy P8 / P9: Protecting Important Habitats and Species
5. Policy P14: Regionally Important Geological / Geomorphological Sites
6. Policy D6: Shopfront Design and Security
7. Policy D7: Advertisements, hanging signs and illumination
8. Policy D9: Residential Infill Development
9. Policy D10: Noise Impacts
10. Policy D10a: Light Impacts and Dark Skies
11. Policy D11: The Corridor of the River Wey and Godalming Navigation
12. Policy D8: Public Realm
13. Policy D15: Renewable and Low Carbon Energy Generation and Storage
14. Policy D19a: Registered Parks and Gardens
15. Policy D21: Enabling Development and Heritage Assets
16. Policy ID5: Protecting Open Space
17. Policy ID6: Open Space in New Developments
18. Policy ID8: Community Facilities
19. Policy ID9: Retention of Public Houses

20. Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

2.5. Below are the policies that Bloor Homes wish to provide further comment on or object to.

1. Policy H7: Review Mechanisms
2. Policy H8: First Homes
3. Policy P6/P7: Biodiversity in New Developments
4. Policy P10: Land Affected by Contamination
5. Policy P11: Air Quality and Air Management Area
6. Policy P12: Water Quality, Waterbodies and Riparian Corridors
7. Policy P13: Sustainable Surface Water Management
8. Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
9. Policy D5: Protection of Amenity and Provision of Amenity Space
10. Policy D5a: External Servicing Features and Stores
11. Policy D8: Public Realm
12. Policy D12: Sustainable and Low Impact Development
13. Policy D13: Climate Change Adaptation;
14. Policy D14: Carbon Emissions from Buildings
15. Policy D16: Designated Heritage Assets
16. Policy D17: Listed Buildings
17. Policy D18: Conservation Areas
18. Policy D19: Scheduled Monuments
19. Policy D20: Non-designated Heritage Assets
20. Policy ID11: Parking Standards

3. Conclusion

3.1. The representations contained in this document are made on behalf of Bloor Homes. They have considered the proposed policies in the LPDMP against GBC's existing development plan, national planning guidance and legislation.

3.2. The comments contained in this representation are made in good faith and to help GBC produce a LPDMP which is clear and unambiguous. This will help reduce uncertainty and planning risk, which ultimately helps improve the

	delivery of housing and growth required and proposed by the LPSS.
Files	
Comment ID	LPDM21A/36
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Policy H4: Housing density – (Deleted).</p> <p>We welcome deletion of Policy H4, which was vague and provided little guidance on appropriate density. We recommend the Council adopt a policy similar to the Burpham Neighbourhood Plan policy B-EN1 in which density is guided by plot size, specifically percentages of open private space to building size, ensuring each home has suitable amenity space. This is preferable to an arbitrary density.</p>
Files	
Comment ID	LPDM21A/48
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Question 6: Any other comments?
Answer	

Comment**Policy H4: Housing density This policy has been deleted?**

However, Compton Parish Council agreed with the option to address housing density in Guildford.

Do you have any other comments or suggestions?

We think that Policy H4 should also take into account the capacity of the local road network and other supporting infrastructure (sewers).

‘Appropriate’ density is vague and offers no basic framework.

Key / iconic views should be maintained

Question 4 - Policy E10: Rural development (including agricultural diversification)

Do you agree with the preferred option to address rural development (including agricultural diversification) in Guildford?

Compton PC agrees with the preferred option to address rural development.

Do you have any other comments or suggestions?

Adequate parking is often an afterthought. Such business may later seek to improve income by diversifying, and residents and Parish Councils have ongoing, unwanted parking issues as a result. These would be better addressed at planning stage.

We would also like to see the policy amended so that flood-lighting is not permitted in the green belt or in areas that impact the countryside, especially the AGLV and AONB. Dark skies are an important characteristic of the AONB, and flood-lighting can impact on wildlife and important ecosystems as well as causing a nuisance to local residents.

The NPPF permits limited ‘infill’. However, there doesn’t appear to be any definition of ‘limited’ and rural ‘infill’ is often on streets, not designed for the type of traffic we have today. The way in which road safety and approval of new

schemes by Surrey Highways needs reviewing. A new build in Compton was permitted with access out onto one of the busiest streets in Surrey (B3000) with very poor sight lines on the basis that there was no history of previous accidents at this spot. This approach is flawed, as there hadn't previously been a property at this site and therefore no one entering or leaving the busy street from this section. Due to the number of applications, no site visit was made.

Question 34 - Policy ID7: Sport, Recreation and Leisure Facilities

Do you agree with the preferred option to sport, recreation and leisure facilities in Guildford?

Compton PC agrees with Policy ID7.

Do you have any other comments or suggestions?

Compton PC would like to see a clause added, which states: "Large sport, recreation and leisure facilities are expected to be of a scale and mass that is appropriate to the surrounding landscape/built environment."

Question 39 - Additional Comments

Do you have any other comments or suggestions for issues that should be considered within the Plan?

Whilst Compton PC supports many of the individual policies with the Development Management Document, we believe that the overall framework (the spatial strategy in the Local Plan) is fundamentally wrong, ie the houses are in the wrong place, and will exacerbate existing traffic congestion on the local road network. There was no consultation or opportunity for input into the framework that underpins the Local Plan. This, has resulted in very little support for the Plan across the borough and despite intensive contributions and suggestions, Compton remains deeply concerned about the impact the Plan in its current form will have on our parish and the wider area.

Files

Comment ID

LPDM21A/52

Respondent ID

38234753

Respondent Name	CPRE (Alivia Kratke)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Online questionnaire: specific policies, sections and paragraphs</p> <p>I wish to make a submission to the Local Plan: Development Management Policies consultation. The comments about specific policies, paragraphs or sections of the plan I would like to submit on behalf of CPRE Guildford are as follows:</p>
Files	

Comment ID	LPDM21A/28
Respondent ID	38162625
Respondent Name	Defence Infrastructure Organisation (Stephen Harness)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Firstly, we would like to thank the Planning Authority for the opportunity to comment on the above document. This letter is on behalf of the Secretary of State for Defence.</p> <p>Please find enclosed a plan showing the extent of MOD land ownership in the Local Plan area. As you will see this is extensive around the Pirbright site. As you will be aware as part of the optimisation of the Defence Estate it is envisaged that there will be significant proposals coming forward during the plan period at the Pirbright site. Please find set out below representations on the above plan in respect of the MOD sites.</p>

This response is separate from any made in respect of the safeguarding of MOD assets. For further information on MOD safeguarding, contact:

For statutory safeguarding: [redacted]

For wind turbine safeguarding: [redacted]

If you have any questions arising, please contact me in the first instance on the above email address.

Background:

In line with the need to ensure matters of National Security are considered and the National Planning Policy Framework (NPPF) it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. As such operational development on MOD establishments should be supported. In turn, due to the need to maintain operational capabilities, development in proximity of MOD Establishments should be required to demonstrate that they align with the ‘agent of change’ principle found in paragraph 187 of the NPPF. As such their development won’t lead to the need for mitigation from MOD activities. It is therefore suggested that emerging development plans include a specific policy to address those needs. Such a policy also needs to recognise the brownfield nature of MOD sites and the MOD’s commitments to bring forward proposals to reduce its built estate, as part of those proposals sites could be declared as surplus. Such policies have been adopted in development plans across the UK.

For MOD operational developments the associated community facilities needed are identified through nationally set guidance known as Joint Service Publications (JSPs). In summary, these seek to identify that the daily needs of service personnel are met within MOD establishments. It would not therefore be appropriate for CIL / Developer contributions policies not to take account of that level of existing provision and “double count” contributions needed. There are specific elements also related to service accommodation as outlined below.

Neighbourhood Plans

The case of *Daws Hill v Wycombe* (C1/2013/0861) established that land should not be included in neighbourhood plans where it would lead to ‘false expectations’ (para 22). Neighbourhood plans should therefore be realistic about

	what they can control. It should be noted that separate legislation applies to the Crown estate and the operational military nature of MOD sites means that engagement and enacting of Neighbourhood plans to cover the area would not be appropriate. It is therefore suggested that designated Neighbourhood Plan areas should exclude MOD establishments.
Files	202111 Pirbright MOD Land.pdf
Comment ID	LPDM21A/15
Respondent ID	10857889
Respondent Name	Dr William Kyte OBE
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	The Local Plan Development policies needs to contain a comprehensive section setting out policy on constraining height and mass of development in sensitive areas as other towns have adopted.
Files	
Comment ID	LPDM21A/18
Respondent ID	9555329
Respondent Name	East Hampshire District Council (Sir or Madam)
Agent Name	
Section	Question 4: Duty to cooperate
Answer	

Comment	Many thanks for consulting East Hampshire District Council on Part 2 of your Local Plan. Having reviewed the content of the Local Plan: Development Management Policies and its supporting evidence base, EHDC do not have any comments.
Files	
Comment ID	LPDM21A/32
Respondent ID	8563265
Respondent Name	Effingham Parish Council (Parish Clerk)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	EPC welcomes the opportunity to comment on the proposed submission local plan: development management policies. While we are broadly supportive of the proposed policies, and welcome in particular the protecting chapter (4) and design chapter (5), we have identified several areas that require further consideration. The remainder of this document sets out those areas in more detail.
Files	
Comment ID	LPDM21A/47
Respondent ID	15689953
Respondent Name	Environment Agency (Thames Area)
Agent Name	
Section	Question 3: Soundness
Answer	

Comment

Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission Local Plan, January 2022 Consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Thank you for consulting the Environment Agency on the Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission Local Plan, January 2022.

Following the adoption of the Local Plan: strategy and sites 2015-2034 in 2019, we understand you are now producing a/the second part of the Local Plan, the Local Plan: Development Management Policies. The aim of the Plan is to provide more detailed planning policies to use when planning applications are determined.

We have reviewed the Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission Local Plan, January 2022 alongside the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options - Consultation and Duty to Cooperate Statement, January 2022 and our advice on and suggestions to policies H5, H6, P6, P7, P8, P9, P10, P12, P13, D11, D12, D13, D14, ID6, ID7 and ID10 as in our letter of 20 July 2020 have been applied. We acknowledge and accept the justifications made where the changes we suggested could not be applied.

Policies we support

We particularly agree with the changes made to and justifications provided to support Policies P12 and D11 and we support these policies.

Soundness

In respect to issues within our remit we consider the Proposed Submission Local Plan: Development Management Policies (2022) to be sound.

Files**Comment ID**

LPDM21A/5

Respondent ID

8570785

Respondent Name

Gatwick Airport Limited (Amanda Purdye)

Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Thank you for your email dated 06 January 2022, regarding the above mentioned planning policy consultation.</p> <p>Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which Gatwick Airport is one. Aerodrome safeguarding is the process used to ensure the safety of aircraft while taking off and landing or flying in the vicinity of aerodromes.</p> <p>It is vital that the safe operation of the airport is not impacted upon by buildings, structures or works. The Guildford Borough area currently sits within our 30km wind turbine safeguarding area and we note with thanks that mention is made under para 5.261 of the above mentioned document with regard to this.</p> <p>Currently Guildford Borough sits outside of our safeguarding zone for development which is 15km. However later this year (date to be confirmed) the Gatwick Safeguarding zone relating to Instrument Flight Procedures (IFPs) is being extended and will include the Guildford Borough area. The exact trigger heights are still to be determined but it is likely that any buildings/structure over 90m (to be confirmed) will need to be referred to us for consultation.</p> <p>Given the above we would ask that the following policy be added to the Development Management Policies Document:</p> <p>Aerodrome Safeguarding Policy Development will only be supported if it is consistent with the continued safe Operation of Gatwick Airport.</p> <p>Where required, the Local Planning Authority will consult with the airport operator and/or the operator of technical sites (eg radar stations) on relevant proposals in the aerodrome safeguarded areas. Statutory consultation responses may require that restrictions are placed on the height of the proposed buildings/structures to avoid impact on the aerodrome, in relation to Instrument Flight Procedures (IFPs) and/or navigational aids.</p> <p>Proposals that cannot be mitigated to the satisfaction of the statutory consultees are considered to be a hazard to</p>

aircraft safety and will be refused.

Reasoned Justification:

Aerodrome safeguarding is a legal requirement by way of ICAO (International Civil Aviation Organisation) and EASA (European Aviation Safety Agency) and is embedded in the Town & Country Planning process by way of ODPM/DfT Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas' Direction 2002.

This policy will ensure that the requirements of aerodrome safeguarding are taken into account in the planning and design of development.

Proposals that cannot be mitigated to the satisfaction of the statutory consultee are considered to be a hazard to aircraft safety and will be refused.

Once the new consultation maps are available and confirmation of the consultation trigger heights has been confirmed we will be in contact with you.

If you have any queries please do not hesitate to contact me.

Files

Comment ID	LPDM21A/23
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Question 6: Any other comments?
Answer	

Comment	<p>Guildford Greenbelt Group are concerned that Reg 18 Policy H4 Density has been removed, with some of the content placed in D4/D9. As these are, to a degree, non-strategic policies, density is something that we could afford to be more specific about, considering it is such an issue across our Borough, and is consistently referred to at Planning Committee. This is most notable with regard to allocated sites decisions, infilling and windfall. The residential Design Guide, dated 2004, is in dire need of review. The Borough lacks a Character Study, and very few Conservation Area Character Appraisals are in place, some awaiting adoption from three years ago. There is a smattering of adopted Neighbourhood Plans. So there is very little in the way of design coding that addresses the Government agenda of Building Beautiful and National Design Guidance.</p> <p>GGG believe there should be tighter controls on density, which also impacts height - a key issue for our Town Centre and our Villages. Sites approved already are destroying the character of our Borough and as this is not placed high enough in the planning balance.</p>
Files	
Comment ID	LPDM21A/49
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Policy H4: Housing Density</p> <p>We attach high importance to a density policy and are opposed to this being deleted.</p> <p>A heights policy is also essential.</p>

Policy E10: Rural Character (including Farm Diversification)

Oppose deletion of this policy.

4) Protecting Chapter

General comment:

The crucial contribution of biodiversity to **landscape beauty, character and distinctiveness** is given insufficient attention.

This has consequences for a borough which includes considerable swathes of countryside designated by parliament for its great natural beauty as AONB. It is also a concerning omission in relation to the scenic contribution of biodiversity and green features to the valued character and distinctiveness of Guildford. Valued, distinctive traits of Guildford include mature trees and other vegetation within and between plots, soft green edges that provide screening to settlements in views, and green corridors along routes (road and river) into settlements. This is flagged in part one of the plan and needs to be followed through in this DMP part of the plan.

This chapter should set out an overarching ambition for **policies to sustain the green character of Guildford** from the perspective of natural beauty by promoting:

- **Space for mature planting within plots**
- **Effective screening to achieve soft green edges to settlements and new developments**

As an illustration we refer to the effective buffer strip along the edge of Boxgrove Gardens along the boundary with Merrow Downs AONB. (In this case not within the plot but the key point is the effectiveness). From the designated countryside, it is not obvious that there is a strategic site behind the trees which thereby make a major contribution to natural beauty not just biodiversity.

Natural beauty benefit of biodiversity: effectiveness of green buffer in view from Merrow Downs in AONB looking onto Boxgrove Gardens Strategic Site

	<ul style="list-style-type: none"> • Space for planting and greenery to provide green approaches along routes into Guildford including along access roads, along the Wey corridor and along the AONB downland and greensand features that extend into the town. <p>Acknowledging the natural beauty aspect of biodiversity will enable Guildford to accommodate change and development in a way that retains its valued green character.</p> <p>Green character should be addressed in a comprehensive way alongside biodiversity, climate change and blue-green infrastructure. Only by setting out the overall objectives in relation to natural beauty can each development contribute to the distinctive green character of the borough.</p> <p>Para 4.2 insert:</p> <p>“This severe decline driven by agricultural <u>and urban</u> intensification, ...”</p>
Files	Guildford Residents Association Image.jpg
Comment ID	LPDM21A/45
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>The society has reviewed the DMP document and makes the following comments on the proposed policies. Where we suggest specific wording changes or additions these are in bold underlined</p> <p>Section 1 Next Steps</p>

1.21 For clarity the DMP should include an appendix of SPD's that are in operation and continue to support the LPSS. This list should also include any planned SPD's

Policy H4: Housing Density [Deleted]

Comment

The Society notes that Policy H4 has been removed and replaced by policy D4 and D5.

The proposed Policy H4 in previous drafts did discuss Densities and Heights:

The NPPF and PPG set out a range of considerations and tools that can assist in establishing appropriate densities on a site or in a particular area, such as accessibility, characterisation and design studies, environmental and infrastructure assessments, and site viability. This is considered preferable to setting minimum density ranges for specific locations (the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges). To set out minimum density ranges is considered to be restrictive and complicated to ascertain and will limit the flexibility that is often needed when determining a planning application.

The Council's preferred option requires the optimal use of land by building homes at the most appropriate density. It is considered the most appropriate approach for Guildford. To apply prescriptive density ranges would restrict the flexibility to take all the site constraints and considerations into account. Sites within Guildford can often have their own challenges, such as the topography of the site, being partially within the flood plain or the impact on views which are crucial to the character and setting of the town centre. Flexibility is needed to ensure the right development can take place. Whilst seeking the optimum use of the land there also needs to be flexibility to ensure that a well-balanced range of housing can come forward to meet Guildford's housing needs.

When considering the relevant issues and options for housing density in Guildford, the Council's preferred approach is to enable well-designed housing at an appropriate density.

There will be a presumption for higher density development in the Town Centre. In the Town Centre there are more limited opportunities for development, yet it is a sustainable location so housing density needs to be optimised. There will also be a presumption for higher density development on strategic sites and within 500 metres of existing or planned transport interchanges. This is because the size of strategic sites will enable thoughtfully designed higher

densities, and being in close proximity to transport interchanges enables opportunities to optimise densities on sustainable sites. The results of the assessment suggest that the preferred option provides a greater amount of guidance and flexibility specific to Guildford borough to help meet the relevant Local Plan objectives.

The Society believes the council by not having clarity on density and height will face major difficulties in managing proposed developments in the future.

As we noted in our response to the first draft of the DMP -- The Society proposes that heights for buildings should respect the height of surrounding buildings and should also ensure the underlying landform can continue to be understood. We propose that the presumption for the borough is that buildings over 6 stories high in town centre and 4 stories in other areas will be allowed only on an exception basis.

We continue to see the 'Ratchet Effect' applied by developers, by referring to other developments, many of which are not good examples of development, as precedent in the Town Centre. This has been apparent recently where we have had developers justifying buildings of inappropriate mass and scale.

Other Towns have Area SPD's or Height SPD's to manage density and height effectively. The Society is aware of least four other LPA's in the near vicinity who have produced such documents.

The council in its SPD- Strategic Sites discussed density effectively and there needs to be an extension of these planning guidelines.

The Society is not against tall buildings but believes there needs to be a proper debate as to where these fit, if required, in Guildford Borough. Height and Mass is a particularly critical issue in areas with Heritage and Countryside value. Many councillors have said that they are against Guildford becoming like Woking; we see nothing in the DMP document to allow effective management of this issue.

Files

Comment ID

LPDM21A/24

Respondent ID

8573793

Respondent Name	Harry Eve
Agent Name	
Section	Question 1: The evidence base and submission documents
Answer	No
Comment	<p>Criticisms of the evidence base for the Local Plan remain. It is essential that these development management policies offer the highest levels of protection against inappropriate development in the interim period before the existing Local Plan can be discarded.</p> <p>One example is evidence for transport infrastructure as it affects many of the policies included in this consultation.</p> <p>At the Local Plan examination that took place in 2018 it was finally acknowledged that the transport assessment was inadequate and that an improved model (“SINTRAM 7”) would be developed to inform the Local Plan going forwards.</p> <p>This has still not emerged and the Local Plan was implemented while still lacking this key information concerning transport infrastructure. The shortcomings in the transport assessment were such that they would understate the impacts on traffic congestion and its associated problems. On close examination for a local area it was found that the modelling was totally inadequate (details were included in my written submission to the Examination).</p> <p>While reliance was placed on certain A3 infrastructure being delivered (part of the Strategic Road Network), the full impacts on the Local Road Network were effectively unknown and ignored.</p> <p>We were also told that more detailed transport assessments would accompany planning applications. In practice Surrey County Council (SCC) have consistently failed to ask for certain key local junctions to be modelled by applicants. GBC has continued to rely on SCC for this advice and applications have been approved on the basis of inadequate traffic evidence. Also – no attempt has been made to assess the overall impact of Local Plan sites as each application comes forward. This means that potential developer contributions to remedy infrastructure issues are being missed.</p> <p>This is unacceptable and undermines confidence in our local authorities and the planning process. Some way must be</p>

	<p>found to rectify the situation before even more damage is done. That damage could be in the form of further land take to build new roads or widen existing ones – or increased congestion and air pollution where necessary improvements are impractical or impossible to achieve.</p> <p>SUGGESTION :</p> <p>As an interim measure, can a development management policy be introduced that allows, and encourages, local councillors to override the advice of Surrey County Council and require further assessment to be carried out on the basis of local knowledge, including junctions that SCC have ignored, and to allow for traffic from all local plan sites to be included ?</p>
Files	REP-8573793-001_Harry_Eve_Matter_9.pdf
Comment ID	LPDM21A/25
Respondent ID	8573793
Respondent Name	Harry Eve
Agent Name	
Section	Question 6: Any other comments?
Answer	Yes
Comment	<p>While acknowledging that there have been improvements I suggest that GBC should be more ambitious in going above and beyond the requirements of the NPPF in setting local policies that protect the environment, mitigate the effects of Climate Change, minimise Co2e emissions and prevent place-breaking (for example through infilling).</p> <p>National policy concerning the Biodiversity Crisis and Climate Change Emergency is lagging behind (until implemented in law) but these aspects are developing rapidly and all policies in the Local Plan should allow for higher standards emerging in the future (rather than preventing those higher standards from being imposed). In other words all these policies must be future-proof. I acknowledge that some wording appears to do this.</p>

Files	
Comment ID	LPDM21A/7
Respondent ID	10903073
Respondent Name	Heine Planning (MRS Alison Heine)
Agent Name	
Section	Question 3: Soundness
Answer	Yes
Comment	<p>There does not appear to be any criteria policy for windfall Gypsy-Traveller sites</p> <p>Policies H13/14 of the 2003 plan are no longer saved</p> <p>There is no criteria policy in the 2019 local plan to inform site allocations.</p> <p>There is a need for a criteria policy to inform windfall sites and ensure allocated sites are fit for purpose and well designed. Other development management policies will be relied on to thwart applications in the absence of well thought out criteria policies.</p> <p>This issue arose over the permission granted for a Showman site as part of the Garlicks Arch development (19/p/02223) where the Council ignored the concerns of the Showman's Guild and myself and granted permission for a site that will fail to serve the needs of most Showmen (due to substandard access) and is probably far too small for what the Council think they have granted as the Council has no policy to inform how large a showman yard needs to be and their requirements and no way of assessing the suitability of any application as made. In the case of Garlicks Arch the site no proper site plan was produced to show how this tiny site would accommodate 6 yards for showmen having regard to the long standing advice of the Guild.</p> <p>This issue may arise again with the allocation at Whittles Arch where the Council has been told the site is not big enough to accommodate additional yards. If the Council had a criteria policy they would be in a better position to</p>

assess the suitability of land allocated/ proposed for new provision and ensure it is fit for purpose/ makes adequate provision.

This approach is contrary to para 11 PPTS which makes clear that criteria should be set to guide land supply allocations and for windfall applications. These criteria based policies should be fair and designed to facilitate the traditional and nomadic life of travellers.

In addition there is a need for criteria policies against which applications for ethnic Gypsy Traveller sites for those who do not comply with the planning definition in PPTS are delivered through housing policies as there is no requirement in para 10 (a) PPTS for Councils to have a 5 year supply of specific sites for this need.

Adopted policy relies heavily on sites being delivered by third parties as part of large scale mixed developments. Yet there are no safeguards in place to say how this will be done. There does not appear to be any policy to ensure sites to be included as part of housing allocations/ strategic sites are delivered as there is for affordable housing. In the absence of such mechanisms and performance measures to inform planning permissions it will be easy for housing developers to find ways of off setting this requirement and/ or failing to deliver sites. Excuses will be found as to why no suitable land can be found or why land thought suitable is no longer available. Policy needs to make clear how sites will be delivered/ managed/ made affordable. It is important that policies make clear how / when such provision will be delivered/ secured to ensure provision is made at specific phases of large developments and not left to the final stage and conveniently overlooked. This is v important as this approach is heavily relied on to deliver Gypsy Traveller sites with no safeguards in place and experience elsewhere in England would strongly suggest that few new GT sites are being delivered this way. It is an untried/ untested approach potentially fraught with problems if Councils do not have proper mechanism/ policies in place to ensure sites are delivered.

In short it is quite astonishing how this proposed plan appears to totally overlook and ignore the needs of Gypsy-Travellers and ensure mechanisms are in place to safeguard long term provision and inform windfall applications for sites-which are bound to arise.

Files

Comment ID

LPDM21A/26

Respondent ID	15746081
Respondent Name	Highways England (Patrick Blake)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Thank you for inviting National Highways to comment on the above consultation.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>National Highways are concerned with policies and proposals that may have the potential to impact on the safe and efficient operation of the SRN, in this case the A3 and M25.</p> <p>Overall, in accordance with national policy, we look to Guildford Borough Council to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN or at its junctions because of planned growth within the borough, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place.</p> <p>When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.</p>

	We have reviewed the Regulation 19 Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission Local Plan January 2022 available on Guildford Borough Council's website.
Files	
Comment ID	LPDM21A/16
Respondent ID	8555425
Respondent Name	Historic England (Sir or Madam)
Agent Name	
Section	Question 4: Duty to cooperate
Answer	
Comment	<p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our previous comments (by letter dated 16 July 2020), Historic England focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraph 28); and contain policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 185).</p> <p>Our comments on the Regulation 18 stage draft Development Management Local Plan have largely been addressed in the Council's response to our comments (email dated 4 February 2021) and are reflected in the current Submission version or are, in our view, not now likely to affect the soundness of the Local Plan. We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy</p>

	<p>required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment , in our view , have been met</p> <p>We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.</p>
Files	
Comment ID	LPDM21A/42
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Policy H4: Housing Density [Deleted]</p> <p>We protest at the deletion of this Policy. To meet the requirements of providing more housing and using “densification” as one means of doing this, (imposed on us by Central Government), and the need to minimise the use of energy and materials and yet to protect the Green Belt, the <u>previous well-established policy of requiring new development to be at a density of 30 – 50dph, except in the designated town centre</u>, should be retained, see also comments on paras 5.13 – 5.15 below.</p>
Files	
Comment ID	LPDM21A/31

Respondent ID	17426113
Respondent Name	Home Builders Federation (Mark Behrendt)
Agent Name	
Section	Question 3: Soundness
Answer	
Comment	<p>Conclusion</p> <p>15. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <ul style="list-style-type: none"> • The viability assessment has failed to take adequate account of policies relating to biodiversity net gain, first homes and electric vehicle charging points; • The 20% biodiversity net gain requirement is unjustified • The requirement to apply parking standards set out in SPD is inconsistent with national policy; • Requirements relating to carbon emissions repeats building regulations <p>16. I can also confirm that I wish to participate in the relevant hearing sessions in order to full represent our concerns which reflect the views of discussions with our membership who account of 80% of the market housing built in England and Wales.</p>
Files	
Comment ID	LPDM21A/30
Respondent ID	17426113
Respondent Name	Home Builders Federation (Mark Behrendt)
Agent Name	
Section	Question 6: Any other comments?
Answer	

Comment	1. Thank you for consulting the Home Builders Federation (HBF) on the proposed submission of development management policies. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
Files	
Comment ID	LPDM21A/46
Respondent ID	8585601
Respondent Name	Jennie Kyte
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Guildford's heritage of narrow streets and a narrow river needs extra protection from being over-shadowed by over-high and bulky buildings.</p> <p>Such buildings cause harm to Guildford's historic setting, Conservation Areas, listed buildings, undesignated heritage, views and parks and so on. For those who visit Guildford, its unique character needs to be cherished and strongly protected.</p> <p>For these reasons, as in some other towns, a height limit of four to five storeys (except in exceptional circumstances) is much needed in the Local Plan Development Management Policies.</p>
Files	
Comment ID	LPDM21A/33

Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Question 6: Any other comments?
Answer	
Comment	<p>1.0 INTRODUCTION</p> <p>1.1 These representations are submitted by Barton Willmore LLP on behalf of Martin Grant Homes (MGH) in response to Guildford Borough Council's (GBC's) Regulation 19 stage consultation on the Proposed Submission Local Plan: Development Management Policies.</p> <p>1.2 As background, MGH owns (freehold) the Gosden Hill strategic site allocated for residential mixed-use development in Policy A25 of the adopted Guildford Borough Local Plan: Strategy and Sites (April 2019).</p> <p>1.3 MGH and its consultant team continues to proactively engage with GBC and other consultees through pre-application discussions which have influenced the development of MGH's emerging masterplan for the site.</p> <p>1.4 These representations comment upon the proposed approaches to policies set out in the Proposed Submission Local Plan: Development Management Policies consultation document, drawing reference to the evolving draft masterplanning prepared by MGH's consultant team. Recommended policy wording is provided where relevant.</p>
Files	
Comment ID	LPDM21A/37
Respondent ID	8825057
Respondent Name	Merrow Residents' Association (Mr Keith Meldrum)
Agent Name	

Section	Question 6: Any other comments?
Answer	
Comment	<p>The Merrow Residents Association is pleased to be able to offer some comments on the regulation 19 consultation on GBC's Development Management Policies. It is also pleased to note the responses to our submission of the 20th July 2020 contained in the regulation 18 consultation statement and that amendments have been made to meet some- but not all- of our concerns.</p> <p>However further to our letter of the 20th July 2020 we still have some concerns and comments on housing density, height of buildings, design and parking and cycling standards.</p> <p>Housing density</p> <p>We are disappointed that there is no policy on housing density.</p> <p>We were hoping to see:</p> <ul style="list-style-type: none">• a set of structured and challenging target density rings around Guildford and the main villages• consciously maximising the density around the hubs and closest to the best travel connections• keeping the suburban and country areas to lower densities where the transport hubs are weaker• making better use of energy efficient building structures and design, allowed by higher density building <p>It is critically important to ensure that there is a clear distinction between housing density and the height of any development. High density doesn't mean increase in height particularly where it would affect views out of, across and into the area.</p> <p>However, a policy covering the density of future developments cannot be considered without also considering height limitations- to which we refer below.</p> <p>GBC in its comments on the 2020 regulation 18 consultation states that Policy D4 seeks a design-led approach with an appropriate density for the site being an outcome, as opposed to adhering to a predetermined density/ range. It goes on</p>

to say that whilst this approach may result in an average density across a site being within such a range, it is often the location of different development forms across a site which are more important in considering whether a proposal is appropriate.

This approach places GBC at the mercy of developers and provides them with maximum flexibility to cram new homes onto a site whilst arguing that they have followed a design-led approach.

Height of Buildings

In our submission of 20th July 2020 on GBC's Local Plan- Issues and Options consultation we stated '*that there should be a presumption against any further tower blocks in the town centre and the height restriction should be clearly defined. We take the view that no new building in the borough should be more than 6 storeys and this should be reduced to 3 storeys in the outlying areas of the town- such as Mellow and Burpham.*' We still hold that view.

The planning application for St Mary's Wharf 21/P/02232 has brought the height of new buildings into stark relief. This has made it clear that the height of any new building shouldn't exceed the height of the current Debenham's building. The submission from Historic England is particularly telling when they say "*However, we consider that the proposal, because of its height and massing, will cause harm to the significance of a large number of heritage asset in the town centre. We have focused our advice on a specific number of assets where we consider the proposal will cause the greatest harm.*" Could anything be clearer or informative than that?

We are aware that many Planning Authorities have addressed the height of buildings positively and produced guidance in an innovative manner. There are many examples of which Guildford planners will be aware. Why cannot GBC do the same? Such a policy would allow some discretion to be introduced into the height of buildings to allow for the level of the ground to be taken into account so that the number of storeys could be increased if the development took place on low ground or in a hollow and the number of storeys reduced if the development was on higher ground. Such a policy could also introduce a range of housing densities in the town centre, in the suburbs and also in the outlying areas and villages of the Borough.

It is our submission that we should do all we possibly can to protect the centre of town from high buildings that not only ruin the views across town but also adversely affect neighbouring properties and historic sites. The best way of doing this is to have a policy on building heights on which developers and Government Inspectors can rely. Without

such a policy developers have free rein to submit proposals that would have the potential to ruin Guildford town centre for ever. Some have argued that we are too late and the height of the Solum development has set a precedent. We argue that this cannot be the case as the Solum development was approved on appeal and took place before the Guildford Local Plan Part 1 was approved in 2019. Then is then and now is now.

In summary we take the view that Guildford needs a clear policy that covers both the height of buildings and the density of housing and that the starting point should be that no building should have more than 6 storeys in the town centre and this should be reduced to 3 storeys in areas outside the town centre.

In addition we consider that policy D11, The Corridor and The River Wey & Godalming Navigations, should be amended to specifically limit building heights so that they comply not only with the above limitation but also restrict building heights to maintain the historic character of this waterway.

Section 5: Design Chapter

We recognise that GBC has addressed the Policy comments in respect of the built environment objectives such as fabric first and low carbon heat sources by way of trying to set requirements at a high aspirational level rather than a technically detailed and specific level. The language GBC use is: *“It is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances.”* In order that this high level approach has some meaning, we need to be assured that the GBC planning department will have the skills and resources to assess and critique planning applications that should include the specific details of solutions proposed.

Files

Comment ID

LPDM21A/19

Respondent ID

38113281

Respondent Name

Ministry of Defence (Chris Waldron)

Agent Name

Section	Question 6: Any other comments?
Answer	
Comment	<p>It is understood that Guildford Borough Council are undertaking a consultation on their Development Management Policies Regulation 19 Document. This document will support development policy within the Authority area.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.</p> <p>Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by ‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’ To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction</p> <p>Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.</p> <p>Having reviewed the supporting documentation in respect of Guildford Borough Council Proposed Development Management Policies there are two areas of interest for the MOD.</p> <p>DIO safeguarding have an area of interest in RAF Odiham and the statutory Aerodrome Height Safeguarding Zone surrounding the aerodrome. RAF Odiham lies approximately 13.5km West of Guildford Borough Council’s local authority area.</p> <p>The Aerodrome Height safeguarding zone serves to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre. This airspace needs to be kept free of obstruction from tall</p>

structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

In addition, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations with associated impacts upon aviation safety and operational capability. Planning Practice Guidance published on the Gov.uk website acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.

Files

Comment ID

LPDM21A/13

Respondent ID

8945505

Respondent Name

Mr Alan Williams

Agent Name

Section

Question 6: Any other comments?

Answer

Comment

I would like to echo some of the concerns recently expressed by Niels Laub, the Chairman of our local RA (Abbotswood Residents Association – Central Crescent, part of GRA) in a response to the Development Management Policies document. Specifically, these relate to Housing Density and the Maximum Height of New Buildings in

	<p>Guildford.</p> <p>New Housing Density; this was one of the key concerns of GRA’s submission to the Local Plan back in July 2020 about which I and many other Guildford residents were particularly worried. It transpired I believe that the housing density numbers input into the Plan were later found to be in error, being overestimated due to the inclusion of a permanent housing requirement for the itinerant student population. I now see that this topic has been entirely removed from the latest Policies document which I would urge you to please reinstate.</p> <p>Maximum Height on New Buildings; my understanding is that is now 8 stories which sadly has allowed the huge Solum Development over and around Guildford station to proceed. This to my mind will be a permanent ‘blot on the landscape’ of our lovely town and will succeed in destroying the wonderful panoramic view of Guildford presently enjoyed from the surrounding hills such as The Mount. Surly we do not want to replicate the example of Woking with their multi story high rise monsters. I would suggest that a maximum height of any new build in Guilford, for domestic, business or retail uses, does not exceed 6 metres.</p>
Files	
Comment ID	LPDM21A/2
Respondent ID	10906145
Respondent Name	Mr Joe Gervasio
Agent Name	
Section	Question 4: Duty to cooperate
Answer	No
Comment	Because the overwhelming majority of local residents affected by this local plan have NOT had their views taken into account.
Files	

Comment ID	LPDM21A/20
Respondent ID	8586369
Respondent Name	Mr Luigi Fort
Agent Name	
Section	Question 1: The evidence base and submission documents
Answer	
Comment	<p>There is considerable concern that the Local Plan is based on significant overestimates of local housing need. The Plan should be delayed until population statistics are reviewed. It is now believed that the Borough is expected to see population decline, not growth. Unnecessary housing development will have, in particular, an adverse effect on local villages. It will destroy their character and communities.</p> <p>Any large-scale development should at the time of application consider in detail infrastructure issues in terms of transport (such as any changes to the M25 J10 or A3 access at Ripley) and public amenities. These should not be afterthoughts.</p> <p>Environmental issues, such as global warming, the protection of wildlife habitats and ecology, flood and run-off management should also be integral to the Local Plan and at least in line with GBC environmental objectives.</p> <p>When it comes to small-scale development, the protection of the Greenbelt should be a high priority. Exceptions to Greenbelt protections should be clear, most notably, the interpretation of 'limited infill'.</p>
Files	
Comment ID	LPDM21A/8
Respondent ID	15265185
Respondent Name	Mr Mike Pocock
Agent Name	

Section	Question 1: The evidence base and submission documents
Answer	Yes
Comment	Generally well supported by evidence
Files	
Comment ID	LPDM21A/9
Respondent ID	15265185
Respondent Name	Mr Mike Pocock
Agent Name	
Section	Question 6: Any other comments?
Answer	Yes
Comment	To repeat perhaps in summary, a generally well thought out plan for the important issues
Files	
Comment ID	LPDM21A/3
Respondent ID	10965825
Respondent Name	National AirTraffic Control Service NATS (Sacha Rossi)
Agent Name	
Section	Question 6: Any other comments?
Answer	

Comment	NATS acknowledges receipt of the Consultation regarding the Guildford Local Plan: Development Management Policies. Having reviewed the Local Plan, <u>NATS has no comments to make</u> . NATS however, continues to work with Developers and remains engaged with Guildford Council in respect of the former Wisley Airfield (site allocation A35) and its future redevelopment, which is anticipated to affect NATS's operations.
Files	
Comment ID	LPDM21A/50
Respondent ID	20475361
Respondent Name	National Grid
Agent Name	Avison Young (Amy Hordon)
Section	Question 6: Any other comments?
Answer	
Comment	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and</p>

	<p>invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning their networks.</p> <p>Please see attached information outlining further guidance on development close to National Grid assets.</p> <p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>
Files	
Comment ID	LPDM21A/29
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Question 6: Any other comments?
Answer	
Comment	<p>Quod has been instructed by our client, Portland Capital, to prepare and submit planning representations in response to the Regulation 19: Proposed Submission Local Plan: Development Management Policies Consultation which runs from 7th January until 18th February 2022.</p>

Portland Capital are freehold owners of Riverside Business Centre, Walnut Tree Close, Guildford, GU1 4UG. Portland Capital therefore have significant investment and hold a vested interest in the evolution of the policy framework affecting the Borough. The planning representations relate to the following draft policies which are included as documents appended to this letter as follows:

- Policy H7 – Review Mechanisms
- Policy H8 – First Homes
- Policy P6/P7 – Biodiversity in New Developments
- Policy P8/P9 – Protecting Important Habitats and Species
- Policy P12 – Water Quality, Waterbodies and Riparian Corridors
- Policy D4 – Achieving High Quality Design and Respecting Local Distinctiveness
- Policy D11 – The Corridor of the River Wey and Godalming Navigations
- Policy D18 – Conservation Areas
- Policy DID6 – Open Space in New Developments
- Policy ID10 – Achieving a Comprehensive Guildford Borough Cycle Network
- Policy ID11 – Parking Standards

We trust this submission provides sufficient detail, however, should you require any further information or clarification, please do not hesitate to contact me. We are keen to remain involved in the Guildford Borough Council (GBC) Local Plan consultation process and reserve the right to attend Examination in Public in due course.

Files

Comment ID

LPDM21A/53

Respondent ID

38241153

Respondent Name

Praidon Darmoo

Agent Name

Section

Question 6: Any other comments?

Answer

Comment**West Clandon - Land between Lime Grove and Green Lane**

The initial Draft Local Plan Included Sites A, B and C my land and neighbours (Mr P Bates) are part of Site C which was then revised to site 1412.

I would propose that access to this Green Belt land would be via the A247, Lime Grove or possibly Green Lane.

- These smaller sites are in my view the correct and necessary way to sympathetically enlarge the village in a controlled manner and should be approved for development within the Green Belt.
- It would allow the correct balance of housing including affordable and social housing to be created to make the village a more cohesive and joined up unit.
- There is an excellent train service for commuters and school children within walking distance being only half a mile away, to London and Guildford. This would reduce the carbon footprint for the area and reduce the number of vehicles travelling through the village.
- There is currently a shortage of school children in the village to attend the local school and extra numbers could lead to its survival.
- There is a local bus service running through the village which could easily be expanded to accommodate the increase in numbers. In addition, there is a local Park & Ride in Merrow for Guildford shoppers. There are good shops in Merrow, Send and a large Supermarket in Burpham. This all reduces the need for vehicle movements in the area.
- I do not think the alternative sites have been adequately represented/shown in your plan to let the residents of West Clandon know where they are and the benefits they would bring including new shops and even a doctors surgery.
- The thought that these sites are less likely to be developed was very unfortunate and should be reconsidered in the revised plan.
- By expanding West Clandon sites CS and D2 on the Green Belt map would retain the village boundaries and would not overflow onto other villages.

Conclusion.

The Wisley Aerodrome site is on hold due to Junction 10 on the M25 being delayed, with the Gosden Hill Farm and Garlic Arch and Send schemes going forward and no plans to improve the A3 the West Clandon sites on the previous plan should now be implemented to give sufficient housing to the Village in an environmentally friendly manner.

Files	
Comment ID	LPDM21A/27
Respondent ID	25985537
Respondent Name	Royal Society for the Protection of Birds (Mr Jack Thompson)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Thank you for consulting the Royal Society for the Protection of Birds (RSPB) on the above document. We have received the Draft Guildford Borough Local Plan: Development Management Policies (“the Local Plan”) and would like to make the following comments to Guildford Borough Council (GBC).</p> <p>1. The RSPB’s interests in Guildford Borough</p> <p>The Guildford Borough area lies within the Thames Basin and Wealden Heaths, a national Priority Landscape for the work of the RSPB. This is one of our highest priority places in the UK for the promotion of conservation at a landscape-scale, adopting the principles advocated by the Lawton report Making Space for Nature (2010)¹, which recommended (in simple terms) more, bigger, better and more joined up protected areas.</p> <p>A substantial part of the Council’s area boundary is subject to statutory nature conservation designations. This includes the Thames Basin Heaths Special Protection Area (SPA); Thursley, Ash, Pirbright, and Chobham Special Area of Conservation (SAC); and a number of Sites of Special Scientific Interest (SSSIs). The RSPB regards the protection and enhancement of the SPAs, SACs, and their associated and surrounding SSSIs as being among the highest priorities for our work nationally.</p>
Files	
Comment ID	LPDM21A/6
Respondent ID	37531905

Respondent Name	Runnymede Borough Council (Judith Orr)
Agent Name	
Section	Question 4: Duty to cooperate
Answer	
Comment	I am writing in response to your email inviting comments on the above document. Having carefully considered its contents, I am writing to let you know that this Council has no comments to make on its contents.
Files	
Comment ID	LPDM21A/51
Respondent ID	8563169
Respondent Name	Send Parish Council (Mrs Debbie Hurdle)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Send Parish Council (SPC) broadly welcomes this document and hopes that it will go some way to achieving greater control and more appropriate balance towards development proposals. Send Parish Council however regrets that this document was not adopted in tandem to the Local Plan Part 1, as this may have helped achieve more sensitive development proposals on several sites already approved in the village by GBC. Most notably Policy D4 and D9 may have been grounds to have helped avoid the over intensification of the Clockbarn Nursery site.</p> <p>Send Parish Council wishes to make the following policy specific comments:</p> <p><u>Policy H4: Housing Density</u></p>

	SPC notes this policy has been deleted and replaced by wording in D4 that links density of sites to a design led approach. Send Parish Council welcomes a designed focused approached to sites but believes that more prescriptive guidance on suitable min-max density for sites in village locations would help to avoid densities that are more suited to urban environments from being applied to village locations.
Files	
Comment ID	LPDM21A/38
Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Question 6: Any other comments?
Answer	
Comment	<p>1.1 This representation outlines St Edward’s position in respect of the Guildford Borough Council Development Management Policies (LPDMP) (Proposed Submission Local Plan) Regulation 19 document (January 2022).</p> <p>1.2. The policies that St Edward object to have the potential to impact on the deliverability and design of developments in the Borough. Where objections are made, suggestions on how to alter the policy or overcome the issue are included.</p> <p>1.3. Guildford Borough Council (GBC) need to consider the objectives of the LPDMP and crucially if it contributes to effective and efficient decision making. At present, the document repeats a lot of national guidance and policies in the adopted Local Plan: Strategy and Sites (2019) (LPSS) which could lead to contradictions between documents and complications to the decision making process.</p> <p>1.4. St Edward has reviewed the relevant policies in the consultation document. A list of the relevant policies St Edward has no comment is provided below.</p>

-
- ? Policy H5 Housing Extensions and Alterations including Annexes
 - ? Policy H6: Housing Conversion and Sub-division
 - ? Policy E11: Animal Related Development
 - ? Policy P8 / P9: Protecting Important Habitats and Species
 - ? Policy P11: Air Quality and Air Management Area
 - ? Policy P12: Water Quality, Waterbodies and Riparian Corridors
 - ? Policy P13: Sustainable Surface Water Management
 - ? Policy P14: Regionally Important Geological / Geomorphological Sites
 - ? Policy D5a: External Servicing Features and Stores
 - ? Policy D6: Shopfront Design and Security
 - ? Policy D7: Advertisements, hanging signs and illumination
 - ? Policy D8: Public Realm
 - ? Policy D10: Noise Impacts
 - ? Policy D10a: Light Impacts and Dark Skies
 - ? Policy D11: The Corridor of the River Wey and Godalming Navigation
 - ? Policy D12: Sustainable and Low Impact Development
 - ? Policy D13: Climate Change Adaptation;
 - ? Policy D14: Carbon Emissions from Buildings
 - ? Policy D15: Renewable and Low Carbon Energy Generation and Storage
 - ? Policy D21: Enabling Development and Heritage Assets
 - ? Policy ID5: Protecting Open Space
 - ? Policy ID6: Open Space in New Developments
 - ? Policy ID8: Community Facilities
 - ? Policy ID9: Retention of Public Houses
 - ? Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
- 1.5. The policies St Edward wish to either comment or object include:
- ? Policy H7: Review Mechanisms
 - ? Policy H8: First Homes
 - ? Policy P6/P7: Biodiversity in New Developments
 - ? Policy P10: Land Affected by Contamination

-
- ? Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
 - ? Policy D5: Protection of Amenity and Provision of Amenity Space
 - ? Policy D9: Residential Infill Development
 - ? Policy D16: Designated Heritage Assets
 - ? Policy D17: Listed Buildings
 - ? Policy D18: Conservation Areas
 - ? Policy D19: Scheduled Monuments
 - ? Policy D19a: Registered Parks and Gardens
 - ? Policy D20: Non-designated Heritage Assets
 - ? Policy ID11: Parking Standards

2. Introduction

2.1. This representation has been prepared by Savills, on behalf of St Edward Homes Ltd, in response to the Guildford Borough Council Development Management Policies (LPDMP) (Proposed Submission Local Plan) Regulation 19 document (January 2022).

2.2. The Local Plan: Strategy and Sites (2019) (LPSS) document sets out GBC's vision, objectives and approaches to development and the location of key sites in the area between now and 2034. The aim of the LPDMP document is to provide more detailed planning policies to help decision making.

2.3. St Edward Homes is a joint venture company owned by Berkeley Homes and M&G Real Estate. St Edward specialises in the delivery of large-scaled mixed-use new communities, brought forward with high quality architecture and significant investment into placemaking, public realm and place-keeping.

2.4. St Edward current interest in the Borough is land allocated under Policy A5: North Street Redevelopment, Guildford of the LPSS. St Edward's will be delivering the redevelopment of a significant part of the site allocation including new homes, commercial units, public realm, replacement bus station and more.

2.5. St Edward are keen to ensure the planning process is efficient and effective in respect of their interest and so provide the following comments on the policies of the LPDMP in good faith.

2.6. St Edward have been in discussion with GBC, statutory consultees and stakeholders about the redevelopment proposals since 2019, and it is anticipated that a planning application will be submitted for the development in summer 2022.

2.7. Whilst the design is still in its emerging stages, St Edward believes that North Street has the potential to deliver c. 500 new homes on an underutilised, mostly derelict, town centre brownfield site. St Edward, as a subsidiary of the Berkeley Group, has a demonstrable track record of delivery. Once the site is granted full planning permission, St Edward could be bringing forward completed homes as early as 2025. We anticipate that the development could be completed by the late 2020s.

2.8. Given the timescales of the draft LPDMP (adoption March 2023, Guildford Borough Local Development Scheme, December 2021), we anticipate that this document will be a material consideration gathering weight at the time of determination of the planning application on the site.

Structure of Representation

2.9. St Edward has provided a review of the relevant policies in this draft document. A list has been provided of the policies St Edward has no comment in the Executive Summary.

2.10. The rest of the document provides a review of the draft policies and outlines St Edward's comments and objections. Where St Edward's have concerns or object to the policies as drafted, they have outlined alternative wording, which the next iteration of the policy document should incorporate.

3. Representations

3.1. The Draft LPDMP document seeks to provide further and more detailed planning policies to use when determining planning applications.

3.2. A review of the policies in the LPDMP is included in the following paragraphs. Whilst St Edward has not commented on all the policies, GBC should consider whether all the policies as drafted are useful and necessary for decisions making; and do not just repeat that which is already stated in the adopted LPSS and national guidance or legislation.

	<p>4. Conclusion</p> <p>4.1. The comments contained in this document are made on behalf of St Edward. They have considered the proposed policies in the LPDMP against GBC’s existing development plan, national planning guidance and legislation.</p> <p>4.2. The comments contained in this representation are made in good faith and to help GBC produce a LPDMP which is clear and unambiguous. This will help reduce uncertainty and planning risk, which ultimately helps improves the delivery of housing and growth required and proposed by the adopted LPSS.</p>
Files	
Comment ID	LPDM21A/17
Respondent ID	8606113
Respondent Name	Susan Hibbert
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>As a resident of Guildford, I write to express my concern that insufficient thought is being given to the question of height restrictions on new buildings in the town and surrounding areas. There seems to be a trend for ever taller buildings as well as a misleading assumption that higher buildings can be tolerated on lower land, such as at the bottom of the High Street and North Street. In fact this would obliterate the special topography of our town, where the rise and fall of the roof lines reflects and enhances the rise and fall of its valley setting, surrounded by hills. This is part of the character of Guildford and part of its charm. As local architect David Ogilvie so cogently argues: “let us make sure that this (the Solum development) is the last time that developers change Guildford from a gap town into a flat town”.</p> <p>The new Development Policies must ensure adequate restrictions on the heights of buildings in Guildford, in the</p>

	valley as well as further up the hills.
Files	
Comment ID	LPDM21A/43
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Question 6: Any other comments?
Answer	
Comment	<p>1.1. This representation, prepared by Savills, outlines Taylor Wimpey’s (TW) position in respect of the Guildford Borough Council Development Management Policies (GBC DMP) (Proposed Submission Local Plan) Regulation 19 document (January 2022), relevant to the Former Wisley Airfield (FWA). TW is broadly supportive of the Draft GBC DMP. They make this representation to the consultation in order to show support and also raise specific issues with particular policies as drafted. The policies where objections have been made, have the potential to impact on the deliverability and design of developments in the borough. Where objections have been identified, suggestions of how to alter the policy or overcome the issue have been made.</p> <p>1.2. Guildford Borough Council (GBC) need to consider the objectives of this plan and crucially what it adds to Local Plan making and existing National policy. At present, the document repeats a lot of National policy and polices in the adopted Local Plan Strategy & Sites (2019) (LPSS). Development in the borough must be guided by these documents anyway, thus repeating the policies adds no extra weight to these policies and the guidance and in some cases works to reduce the visibility and understanding of the specific policies in this plan.</p> <p>1.3. TW and FWA project team have provided a review of the relevant policies in this draft document. A list has been provided of the policies TW support, no further comment has been provided on these in the main representation. The policies TW support are:</p>

-
- Policy P13: Sustainable Surface Water Management
 - Policy D6: Shopfront Design and Security
 - Policy D7: Advertisements, hanging signs and illumination
 - Policy D10: Noise Impacts
 - Policy D14: Carbon Emissions from Buildings
 - Policy D15: Renewable and Low Carbon Energy Generation and Storage
 - Policy ID8: Community Facilities

1.4. The rest of the representation provides a review of the draft policies and outlines TW's comments and objections. Where TW have concerns or object to the policies, as drafted, they have outlined alternative wording which the next iteration of the policy document should consider.

1.5. The main policies TW wish to comment on or object to, include:

- **Policy H7: Review Mechanisms:** The evidence base prepared by Dixon Searle is noted re: viability. TW reserves its position, for any necessary comment on this evidence base in light of the progress on discussions on Wisley Airfield, the approach to affordable housing and infrastructure delivery.
- **Policy H8: First Homes:** the homes are required to be no higher than £250,000 which will lead to a high proportion of 1 bed units. This should be adapted to ensure that there is flexibility allow for the scenario where there is no demand for the likely 1 bed first homes.
- **Policy P6/P7: Biodiversity in New Developments:** adaptations to make the policy clearer and more robust, better aligned with National guidance, and ensuring the policy has realistic expectations for developments in the borough.
- **Policy P8/P9: Protecting Important Habitats and Species:** overall, TW's view is that elements of the current policy wording and supporting text have the potential to result in the incorrect evaluation of irreplaceable habitats, the incorrect application of biodiversity policy, which in turn has the potential to significantly constrain the delivery of sustainable development within the borough. On this basis the policy is not justifies or consistent with national policy
- **Policy P10: Land Affected by Contamination:** alterations to the policy to request the requirements can be a condition attached to a decision notice.

-
- **Policy P11:** Air Quality and Air Quality Management Areas: alterations to the policy to make it appropriate and less onerous.
 - **Policy P12:** Water Quality, Waterbodies and Riparian Corridors: altered wording so that the policy is less restrictive and positively prepared.
 - **Policy D4:** Achieving High Quality Design and Respecting Local Distinctiveness: question the need for another policy to address the same issues as Local Plan Policy D1 and the Strategic Development Framework (SDF) Supplementary Planning Document (SPD) and TW do not feel this policy should be applicable to strategic sites.
 - **Policy D5:** Protection of Amenity and Provision of Amenity Space: encourage a balance between private and public amenity spaces.
 - **Policy D8:** Public Realm: alterations to the policy to include reference to Design Codes for strategic sites and to ensure there is enough flexibility that the public realm is appropriate for each individual site.
 - **Policy D9:** Residential Infill Development: add clarity to the policy to ensure that it is clear which sites the policy is directed at, i.e. not strategic sites.
 - **Policy D12:** Sustainable and Low Impact Development: policy should be altered to refer to the Climate Change, Sustainable Design, Construction and Energy SPD.
 - **Policy D13:** Climate Change Adaptation: policy should be altered to refer to the Climate Change, Sustainable Design, Construction and Energy SPD.
 - **Policy D16:** Designated Heritage Assets: seeks minor amendment to the Policy and that policies D17 to D20 are incorporated within this policy concisely.
 - **Policy D17:** Listed Buildings: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.
 - **Policy D18:** Conservation Areas: question the need for the policy and suggest an additional line which could be

added to Policy D16 to cover the thrust and aims of this policy.

- **Policy D19:** Scheduled Monuments: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.
- **Policy D19a:** Registered Parks and Gardens: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.
- **Policy D20:** Non-designated Heritage Assets: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.
- **Policy ID6:** Open Space in New Developments: adequate weight should be given to relevant SPD's and Policy D1 in the Local Plan (2019) and request for further clarity to the policy.
- **Policy ID10:** Achieving a Comprehensive Guildford Borough Cycle Network: some of the suggested routes are not within the public highway and take a different alignment to the routes agreed with Stakeholders TW have consulted.
- **Policy ID11:** Parking Standards: concern regarding the visitor parking requirements and the effects on sustainability and the overall masterplan.

2. Introduction

2.1. This representation has been prepared by Savills, on behalf of Taylor Wimpey (TW) in response to the Draft Guildford Borough Council Development Management Policies (GBC DMP) (Proposed Submission Local Plan) Regulation 19 Consultation. The representation outlines TW's position in respect of the GBC DMP relevant to the Former Wisley Airfield (FWA).

2.2. The Local Plan Strategy & Sites (2019) (LPSS) sets out GBC's vision, objectives and approaches to development and the location of key sites in the area between now and 2034. The GBC DMP document will provide further and more detailed planning policies to use when determining planning applications.

2.3. Notably GBC has adopted its Strategic Development Framework Supplementary Planning Document, July 2020

(SDF SPD), which provides site specific guidance for the FWA (Allocation A35). This SPD, along with the Strategic Design Code, which is required to be submitted with any planning application for a strategic site, will contain detailed design guidance. The GBC DMP should not be repetitive to existing policy / guidance, and should be drafted with the objective of being positively prepared to aid the determination of planning applications on strategic sites compared to site specific policies contained in the SPD and Design Code which TW request is noted within the GBC DMP itself.

2.4. TW are in control of FWA, a significant proportion of the site allocated within the adopted LPSS as one of the main strategic allocations. Its allocation secures a significant number of homes needed in the borough, and the site makes up the vast majority of the land included within Allocation A35.

2.5. Policy A35 of the LPSS allocates the site for:

- Approximately 2,000 homes (C3), including some specialist housing and self-build plots;
- Approximately 100 sheltered/Extra Care homes (C2 use);
- 8 Gypsy and Traveller pitches;
- Approximately 1,800 sq m of employment floorspace (B1a);
- Approximately 2,500 sq m of employment floorspace (B2/B8);
- Approximately 500 sq m of comparison retail (A1);
- Approximately 600 sq m of convenience retail (A1);
- Approximately 550 sq m services in a new Local Centre (A2 –A5);
- Approximately 500 sq m of community uses in a new Local Centre (D1);
- A primary school (D1) (two form entry); and
- A secondary school (D1) (four form entry, of which two forms are needed for the housing on the site and two for the wider area).

2.6. In addition, Suitable Alternative Natural Greenspace (SANG) will be provided on site in order to mitigate harm to the Thames Basin Heaths Special Protection Area (TBH SPA).

Taylor Wimpey

2.7. Taylor Wimpey is one of the UK's largest residential developers building over 15,000 homes per year from 24 regional businesses across England, Scotland and Wales. TW are a responsible community developer, committed to working with local people, community groups and local authorities, keeping them informed about their work throughout the life of the development and creating a lasting legacy.

2.8. Relevant for FWA, TW's Mission Statement is as follows:

'Working together to deliver our sustainable community'

Working – To openly communicate, meet, engage and consult;

Together – Taylor Wimpey, VIVID (Registered provider), Guildford Borough Council, Surrey County Council, community and stakeholders;

Deliver – Adopted Local plan, key housing needs in line with GBC's housing trajectory;

Sustainable – Climate change and resilience, sustainability, biodiversity, transport, health and wellbeing;

Community – Stewardship, forward thinking, exemplar and proud legacy.

Planning Application

2.9. TW's intention is to submit a Hybrid application in Spring 2022. The timescales for a planning application reflect the LPSS housing trajectory, with delivery of the first units in 2024. As GBC are aware, TW are committed to engaging in LPSS Policy D1 design/ masterplanning process to guide the proposed planning submission, including public consultation. The need for housing delivery from the site is now pressing, as the application, has to date, been delayed owing to the Development Consent Order process for the A3/M25 Junction 10 improvements.

2.10. Given the timescales of the draft GBC DMP, we anticipate that this document will be a material consideration gathering weight at the time of submission of the 'Hybrid' application at FWA.

Structure of Representation

2.11. TW and the project team have provided a review of the relevant policies in this draft document. A list has been provided of the policies TW support in paragraph 3.3 of this representation, no further comment has been provided on these in the main representation.

2.12. The rest of the document provides a review of the draft policies and outlines TW's comments and objections. Where TW have concerns or object to the policies as drafted, they have outlined alternative wording which the next iteration of the policy document should consider.

3. Representations

3.1. The Draft GBC DMP document seeks to provide further and more detailed planning policies to use when determining planning applications.

3.2. Notably in the case of strategic sites, such as FWA, TW and their design team will produce a series of Design Codes, guided by the Design Framework Parameter Plan, ahead of the submission of the Reserved Matters applications ('RMs). This will provide further guidance on detailed design matters and include built area typologies and character areas and their associated design principles.

3.3. TW and the project team have provided a review of the relevant policies in this draft document. Below is a list of the policies TW support. TW have not provided any further comment on these in the main representation. However, GBC need to consider what the policies within the final DMP document add and ensure only valuable input, which is not already included in LPSS and National policy, is added.

- Policy P13: Sustainable Surface Water Management
- Policy D6: Shopfront Design and Security
- Policy D7: Advertisements, hanging signs and illumination
- Policy D10: Noise Impacts
- Policy D14: Carbon Emissions from Buildings
- Policy D15: Renewable and Low Carbon Energy Generation and Storage
- Policy ID8: Community Facilities

3.4. Below are the policies that TW wish to provide further comment on or object to. The full list of these policies was provided in **Paragraph 1.5** of this representation.

Heritage Policies

3.74. Across policies D16 to D20 there is a lot of repetition. It would be more effective to delete the unnecessary repetition and include one policy on heritage. It is not considered that policies D17 to D20 do not add much more than that which is stated in policy D16 or national policy.

Files

Comment ID	LPDM21A/41
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>Thakeham Homes Ltd is submitting representations to the draft Guildford Borough Local Plan: Development Management Policies Regulation 19 consultation. Thakeham is a house builder based in Sussex with a track record for delivering high quality, sustainable developments across the south of England. We have a proven track record of working with landowners to deliver sites for much need housing but also work very closely with Registered Providers, Local Planning Authorities, local residents and community groups to deliver sustainable developments that can benefit the community.</p> <p>We note climate change resilience, the minimisation of environmental impacts and achieving high quality design continue to be important to the Council as set out within the detailed Development Management Policies and Thakeham fully supports these aims and objectives. However, we wish to raise the following comments in respect of some of the draft policies and would like to see these reflected within the Submission version of the Plan.</p>
Files	

Comment ID	LPDM21A/21
Respondent ID	38135265
Respondent Name	Thames Water (David Wilson)
Agent Name	
Section	Question 6: Any other comments?
Answer	

Comment	<p>Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.</p> <p>As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Borough of Guildford and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have a number of comments on the consultation document as set out below:</p>
Files	
Comment ID	LPDM21A/22
Respondent ID	38135265
Respondent Name	Thames Water (David Wilson)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p><u>Proposed Water Supply and Wastewater/Sewerage Infrastructure Policy:</u></p> <p>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p>

Such an approach was set out in the previous consultation, and we supported Part 2 as Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in the AMP7 period which runs from 1st April 2020 to 31st March 2025 and does not therefore cover the whole Local Plan period. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat, will take place during 2024.

Hence, a further text should be added to Policy 9 as follows: **“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”**

In 2019/20, Thames Water pledged to reduce their net carbon emissions from their operations to zero by 2030.

In 2020/21, Thames Water generated 23% of their own electricity needs from renewable sources including sludge, wind and solar power. Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but we are also exploring new opportunities such as solar panels and heat recovery, and these should be supported in accordance with the London Plan and NPPF 2021 which sets out at paragraph 148 that the planning system should support renewable and low carbon energy and associated infrastructure.

Files

Comment ID

LPDM21A/4

Respondent ID

37529473

Respondent Name

The Coal Authority (Deb Roberts)

Agent Name

Section	Question 6: Any other comments?
Answer	
Comment	<p>Thank you for your email below regarding the Proposed Submission Local Plan: Development Management Policies Consultations.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, Guildford Borough Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>
Files	
Comment ID	LPDM21A/14
Respondent ID	15584513
Respondent Name	Transport for London (Richard Carr)
Agent Name	
Section	Question 4: Duty to cooperate
Answer	
Comment	<p>Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the proposed submission Local Plan</p>

Files	
Comment ID	LPDM21A/39
Respondent ID	11252545
Respondent Name	Waverley Borough Council
Agent Name	
Section	Question 4: Duty to cooperate
Answer	
Comment	<p>Thank you for giving Waverley the opportunity to comment on the proposed submission development management policies. As with our responses to previous consultations, Waverley's interest relates to cross-boundary issues.</p> <p>Our response to the Issues and Preferred Options Consultation set out that we would need further information about the site allocations for renewable and low carbon energy development before we could comment on the approach and consider any cross-boundary impacts. We note that this approach has been changed and that the Proposed Submission Local Plan does not seek to allocate any sites for renewable and low carbon energy. The approach in the Local Plan is therefore now unlikely to have any cross-boundary issues and we consider that should an application come forward on a site for renewable and low carbon energy development, any potential cross-boundary impacts could be dealt with through the development management process.</p> <p>We do not anticipate that any of the other development management policies would have any cross-boundary impacts.</p> <p>Waverley values joint co-operation with its adjoining boroughs and districts and looks forward to further working with Guildford Borough Council.</p>
Files	
Comment ID	LPDM21A/11
Respondent ID	8609217

Respondent Name	West Clandon Parish Council (Sir or madam)
Agent Name	
Section	Question 6: Any other comments?
Answer	
Comment	<p>West Clandon Parish Council has the following comments on the DMPs.</p> <p>As a general comment, the monitoring measure stated for most of the policies is unquantified and is based on the number of times a Planning Inspector overturns a GBC decision. There is therefore a perverse incentive (to avoid looking bad on this measure) to grant contentious applications and avoid appeals.</p>
Files	

Report run at 9 Jun 2022 14:04:37. Total records: 50

Regulation 19 Local Plan: Development Management Policies, all representations for "Online questionnaire: specific policies, sections and paragraphs" in respondent order.

Comment ID	LPDM21B/290
Respondent ID	8993793
Respondent Name	Berkeley Homes Southern Ltd. (Sir or Madam)
Agent Name	Quod (Matt Briant)
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H7: Review Mechanisms</p> <p>2.1 Draft Policy H7 seeks to review the viability of consented schemes which may not have been able to achieve policy compliance on the date that the planning permission was granted. Policy H7 would be used to establish whether, at a later date or dates during the implementation of the scheme, contributions towards meeting minimum policy requirements that were not possible the point that the scheme was consented can now be met. A review mechanism would be sought via legal agreement and:</p> <p>3) <i>"The review mechanism will specify a trigger point or points for undertaking viability review which will reflect:</i></p> <p><i>a) a late stage review which should be undertaken prior to the sale or lease of 75% of market homes, or at an agreed similar point; and</i></p> <p><i>b) for large-scale phased development, an additional mid-stage review prior to implementation of the second half or</i></p>

later phase/s of the development.

4) In the case of a late stage review, the contribution will be by payment in lieu, unless otherwise agreed. Should an additional mid-stage review be agreed, the Council will seek any additional affordable housing provision on-site unless it is satisfactorily demonstrated to be impractical.”

2.2 The draft Local Plan states that there is “*No key evidence to support*” draft policy H7.

Assessment

2.3 The current Regulation 19 consultation on the Development Management Policies represents part 2 of the Guildford Borough Local Plan, with the adopted Local Plan: Strategy and Sites (2015 - 2034) (‘LPSS’) being Part 1.

2.4 Policy H2 (Affordable homes) of the adopted LPSS makes it clear that:

“If developers satisfactorily demonstrate that providing the amount of affordable housing required by this policy would not be economically viable, the Council will consider the following to assist with delivering a scheme:

a) varying the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; and/or

b) reducing the overall number of affordable homes.”

2.5 The above is subject to viability, which will confirm the quantum of affordable housing which can be provided on a given application site. The final agreed figure will be secured through a Section 106 (S106) agreement. The provision to consider viability is therefore already part of the Local Plan and there is no evidence to support the need for additional review mechanisms.

2.6 The drafting of policy H7 also fails to comply with national guidance. Paragraph 009 (Ref ID: 10-009-20190509) of the Planning Practice Guidance (PPG) states:

“Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and

terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles.”¹ **(our emphasis)**

2.7 The key point emboldened above is that local plans must set out the circumstances in which review mechanisms are appropriate, as well as a clear process and terms of engagement for the implementation of such reviews.

2.8 Draft policy H7 does not provide a specific set of circumstances in which review mechanisms will be required, instead providing a blanket approach which allows the Council to impose additional reviews at its discretion with no justification. The lack of clear criteria for requiring review mechanisms results in draft policy H7 being contrary to the PPG and to paragraph 16.d) of the National Planning Policy Framework (‘NPPF’)².

2.9 Review mechanism are ordinarily only required for very large, multi-phased schemes delivered over many years, such as garden towns, where there can be difficulty in forecasting costs /values at the planning application stage. The introduction of late stage reviews for smaller residential and mixed-use schemes would be disproportionate and create uncertainty for developers and investors, which could adversely impact on housing delivery. On a scheme where viability is finely balanced, the need to pause construction and undertake a further assessment of viability would add both unnecessary time and cost to the developer, and delay the delivery of housing. This would be exacerbated in the event that the Council disagrees with the viability conclusions of a late stage review, and further detailed assessment and negotiation is required. There is no guidance as to what would happen in such a scenario.

2.10 It should also be recognised that values can move both up and down during the lifetime of a development proposal. The policy does not allow for worsening viability, with paragraph 2.36 of the supporting text stating:

“It is important to be clear that the implementation of viability review cannot result in the scheme providing a reduced level of planning obligations from that of the originally permitted scheme. It is a means to ensure full/er policy compliance over time, optimising benefits for contributions to affordable housing.”

2.11 It would be unfair to assume that viability can only improve during the course of a development, particularly when taking cost inflation into account. Therefore, it would be appropriate for the Council to drop the policy or to only consider review mechanisms which operate in either direction.

	<p>2.12 In summary, the policy as drafted fails to apply the PPG guidance and imposes onerous additional reviews on developers, which are likely to result in delays and reductions in housing delivery. The proposed policy has not been justified. Policy H2 of the LPSS already considers the viability of developments and there is no evidence to suggest that a further policy on review mechanisms is required.</p> <p>2.13 We therefore request that draft policy H7 is removed from any future iterations of the Local Plan Development Management Policies.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/291
Respondent ID	8993793
Respondent Name	Berkeley Homes Southern Ltd. (Sir or Madam)
Agent Name	Quod (Matt Briant)
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy H8: First Homes

2.14 Draft Policy H8 requires that a minimum of 25% of affordable homes should be provided as First Homes, to be sold at a minimum discount of at least 30% of the market value of homes. The draft policy adds that:

3) *“Where the affordable housing contribution for a proposed development comprises a mixture of homes and financial contributions towards affordable housing, First Homes are required to form 25% of the overall monetary value of affordable housing contributions.”*

2.15 The supporting text for the draft policy states that:

“The requirement for First Homes delivery will not impede the requirement in LPSS 2019 Policy H2: Affordable Homes and the Council’s Housing Strategy that 70% of all affordable homes delivered through affordable housing contributions will be for affordable rent, with First Homes requirements being delivered within the 30% required under the policy as being for other forms of affordable housing within the NPPF definition.” (para. 2.53).

2.16 The key evidence cited in the draft Local Plan for this policy includes HM land Registry data on new-build sale prices in Guildford and the ‘West Surrey Strategic Housing Market Assessment (Guildford Borough Council, 2015) (‘SHMA’) and Guildford Addendum Report 2017 (‘GAR’).

Assessment

2.17 The inclusion of a policy for First Homes in the draft Local Plan is not opposed by BHSL but it requires additional text to ensure planning applications already in the system are not prejudiced once the Local Plan is adopted.

2.18 Although First Homes are a form of affordable housing and policy H2 concerning affordable housing is an adopted policy under the LPSS, draft policy H8 represents an extension of the affordable housing policy rather than a duplication. The PPG encourages local authorities to make the development requirements for First Homes clear for their area, such as through updating relevant local plan policies³. The inclusion of a First Homes policy is therefore expected given it is the Government’s preferred discounted market tenure and *“should account for at least 25% of all affordable housing units delivered by developers through planning obligations.”*

2.19 However, many residential and mixed-use schemes have to balance the provision of affordable housing of different types and tenures with the overall viability of the development. The nature of First Homes is such that

developers typically waive 30% of the real market value of the First Home properties. Whilst a 30% reduction in value is generally unlikely to cause issues with viability, draft policy H8 requires a “*minimum discount of at least 30%*” (**our emphasis**). In situations where the First Homes discount rises above 30%, the viability of a scheme is more likely to be adversely affected. Therefore, should the First Homes policy be adopted by the Council prior to the determination of current schemes, it could impact on their viability, impacting on the balance and quantum of affordable housing and making these schemes less viable and potentially undeliverable.

2.20 Draft policy H8’s introduction late in the determination period of such an application would be inappropriate, as it may result in the application being refused due to a lack of First Homes being provided, despite a concerted effort to ensure the best affordable outcome at the time of submission.

2.21 Consequently, we politely request that draft policy H8 is amended to only apply to applications for planning permission which are submitted to the Council following the adoption of the Local Plan Development Management Policies. This would avoid applications which have already been subjected to rigorous financial viability assessment by both the developer and the Council from being made less viable, such that the development cannot be delivered and contribute to the Council’s future housing stock.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/292

Respondent ID

8993793

Respondent Name

Berkeley Homes Southern Ltd. (Sir or Madam)

Agent Name

Quod (Matt Briant)

Section

Policy P6/P7: Biodiversity in New Developments

Do you consider this section of the document is Legally Compliant?

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy P6/P7: Biodiversity in New Developments

2.22 Draft Policy P6/P7 requires a biodiversity net gain (BNG) of “*at least 20 per cent, or the advised national minimum amount, whichever is greater*”, rather than the 10% which will eventually become mandated in national guidance.

2.23 The supporting text (para. 4.44) notes that a minimum biodiversity net gain of 20% is “*higher than the proposed 10% net gain recommended nationally*”, citing that “*Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole*”. It also states that the 20% figure “*is more consistent with the NPPF as the higher figure provides greater certainty that a genuine net gain will be achieved*”.

Assessment

2.24 Within Section 98 of the new Environment Act 20215, there is provision for achieving a 10% BNG within a development, with the particulars being covered under Schedule 14 of the Act. However, secondary legislation is required under Section 4(6) of Schedule 14 of the Act before the BNG requirement becomes a legal requirement; this has yet to be completed. Hence, currently there is no legal requirement to demonstrate a 10% BNG. It does, however, indicate the direction of travel for national guidance on BNG values, which BSHL supports.

2.25 Current national policy states that Local Authorities should, when making planning decisions, seek to minimise impacts on and provide net gains for biodiversity”⁶, whilst paragraph 180 of the NPPF suggests LPAs should consider “*opportunities to improve biodiversity in and around developments [which should] be integrated as part of their design, especially where this can secure measurable net gains for biodiversity*”. It should be noted however that there is nothing within the NPPF which indicates what increase, in terms of percentage, of gain is required to comply with the policy, nor is any standardised methodology specified. There is no support either for an assertion that over provision is necessary to achieve policy objectives. Indeed, the purpose of the metric developed for calculating BNG is to ensure fairness and the sufficiency of provision.

	<p>2.26 Given that the emerging requirement for 10% gain has been derived and tested through careful policy development, there is no justification for an arbitrary or unilateral increase beyond that figure. Neither is there any evidence that the Council has considered the implications or deliverability of such a requirement.</p> <p>2.27 It is our view that there is no basis for the BNG target for the Guildford Borough departing from emerging national policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/147
Respondent ID	38182209
Respondent Name	Blackwell Farm Ltd & University of Surrey
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy P6/P7 identifies a requirement for at least 20% biodiversity net gain, or the advised national minimum amount, whichever is greater.

Our clients support the concept of biodiversity net gain and are aware that the Environment Act 2021 requires all development schemes in England to deliver a mandatory minimum 10% biodiversity net gain to be maintained for a period of at least 30 years. Mandatory biodiversity net gain as set out in the Environment Act will apply in England once the Town & Country Planning Act is amended and currently is likely to become law in 2023.

It is clear that the government has heard pleas for higher and lower targets through consultation but have concluded that 10% strikes the right balance and has legislation lined up at this level.

Our clients are not persuaded that a minimum 20% level, as required in draft policy P6/P7, is necessary, given that the mandatory minimum is set at 10% by the government.

It is possible that a minimum of 20% could have unwelcome impacts on development viability. Many allocated development sites have a range of obligations they are expected to meet and contributions to provide and having a BNG set at a minimum of 20% rather than 10% could add costs, perhaps to the extent that other requirements or contributions may have to be reduced.

Our client notes that the impact of the BNG policy has been considered in the Guildford Borough Council – LPDMP & Stage 1 CIL Viability Assessment – Final Report (Dec 2021).

However, our client remains concerned that the results of this assessment can only provide a high-level assessment of the potential viability of the strategic sites. In reality, the impact of a minimum 20% BNG requirement could be to affect viability unfavourably and could therefore affect the provision of other requirements and contributions.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/148

Respondent ID

38182209

Respondent Name

Blackwell Farm Ltd & University of Surrey

Agent Name	Terence O'Rourke (Steve Molnar)
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D14: carbon emissions from buildings. Our client notes that this policy strongly supports and encourages low carbon and decentralised energy development, including low carbon heat distribution networks, and agrees with this approach.</p> <p>The policy also includes strong encouragement to improve on the standards in the Building Regulations Part L. Our client supports that the latest national standards must be met, and acknowledges the encouragement provided to go beyond this, and the reasons for it.</p> <p>However, in some instances going beyond required national standards can mean additional development costs that may mean that some other elements must be cut back.</p> <p>Whilst the policy 'encourages' but does 'require', it is important to be clear that this does not become interpreted as a requirement if the policy is adopted in this form, and that expectations are managed accordingly.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/149
Respondent ID	38182209

Respondent Name	Blackwell Farm Ltd & University of Surrey
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D15: renewable and low carbon energy generation and storage. Our client supports this policy and its supporting text, which together address how renewable and low carbon energy generation and energy storage proposals will be addressed.</p> <p>This is an important area of policy given the zero carbon ambitions of both the Borough Council and the University of Surrey, and the scale of efforts that are required to achieve these.</p> <p>Mapping out in this policy and its supporting text how the Borough Council will deal with planning applications that may come forward for this essential infrastructure is an important step that is welcomed.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/150
Respondent ID	38182209
Respondent Name	Blackwell Farm Ltd & University of Surrey
Agent Name	Terence O'Rourke (Steve Molnar)

Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID10: comprehensive borough cycling network. Our client notes that the network on the Policies Map includes the cycle elements of the sustainable movement corridor into the Blackwell Farm site allocation, routes through Manor Park, Stag Hill and the Surrey Research Park, and also includes 'green cycle routes' through woodland owned by the university.</p> <p>Our client supports the routes across the university's land, including those linking the town to the Blackwell Farm local plan allocation.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/88
Respondent ID	38120513
Respondent Name	Blackwell Park Limited (Stephen Baker)
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy P6/P7 identifies a requirement for at least 20% biodiversity net gain, or the advised national minimum amount, whichever is greater.

Our clients support the concept of biodiversity net gain and are aware that the Environment Act 2021 requires all development schemes in England to deliver a mandatory minimum 10% biodiversity net gain to be maintained for a period of at least 30 years. Mandatory biodiversity net gain as set out in the Environment Act will apply in England once the Town & Country Planning Act is amended and currently is likely to become law in 2023.

It is clear that the government has heard pleas for higher and lower targets through consultation but have concluded that 10% strikes the right balance and has legislation lined up at this level.

Our clients are not persuaded that a minimum 20% level, as required in draft policy P6/P7, is necessary, given that the mandatory minimum is set at 10% by the government.

It is possible that a minimum of 20% could have unwelcome impacts on development viability. Many allocated development sites have a range of obligations they are expected to meet and contributions to provide and having a BNG set at a minimum of 20% rather than 10% could add costs, perhaps to the extent that other requirements or contributions may have to be reduced.

Our client notes that the impact of the BNG policy has been considered in the Guildford Borough Council – LPDMP & Stage 1 CIL Viability Assessment – Final Report (Dec 2021).

However, our client remains concerned that the results of this assessment can only provide a high-level assessment of the potential viability of the strategic sites. In reality, the impact of a minimum 20% BNG requirement could be to affect viability unfavourably and could therefore affect the provision of other requirements and contributions.

What changes do you suggest should be made

to the document?	
Files	
Comment ID	LPDM21B/89
Respondent ID	38120513
Respondent Name	Blackwell Park Limited (Stephen Baker)
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D14: carbon emissions from buildings. Our client notes that this policy strongly supports and encourages low carbon and decentralised energy development, including low carbon heat distribution networks, and agrees with this approach.</p> <p>The policy also includes strong encouragement to improve on the standards in the Building Regulations Part L. Our client supports that the latest national standards must be met, and acknowledges the encouragement provided to go beyond this, and the reasons for it.</p> <p>However, in some instances going beyond required national standards can mean additional development costs that may mean that some other elements must be cut back.</p> <p>Whilst the policy 'encourages' but does 'require', it is important to be clear that this does not become interpreted as a requirement if the policy is adopted in this form, and that expectations are managed accordingly.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/90
Respondent ID	38120513
Respondent Name	Blackwell Park Limited (Stephen Baker)
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D15: renewable and low carbon energy generation and storage. Our client supports this policy and its supporting text, which together address how renewable and low carbon energy generation and energy storage proposals will be addressed.</p> <p>This is an important area of policy given the zero carbon ambitions of both the Borough Council and the University of Surrey, and the scale of efforts that are required to achieve these.</p> <p>Mapping out in this policy and its supporting text how the Borough Council will deal with planning applications that may come forward for this essential infrastructure is an important step that is welcomed.</p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/91
Respondent ID	38120513
Respondent Name	Blackwell Park Limited (Stephen Baker)
Agent Name	Terence O'Rourke (Steve Molnar)
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID10: comprehensive borough cycling network. Our client notes that the network on the Policies Map includes the cycle elements of the sustainable movement corridor into the Blackwell Farm site allocation, routes through Manor Park, Stag Hill and the Surrey Research Park, and also includes 'green cycle routes' through woodland owned by the university.</p> <p>Our client supports the routes across the university's land, including those linking the town to the Blackwell Farm local plan allocation.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/206
Respondent ID	20855809

Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H7: Review Mechanism – object</p> <p>2.6. Part 1) of the draft policy states that “If a reduced contribution to affordable housing than that which is required by the Local Plan is proposed and justified on viability grounds, the Council will, where it considers appropriate, require a viability review mechanism to be secured”.</p> <p>2.7. Bloor Homes supports the delivery of affordable homes in compliance with up to date planning policy. In some instances the delivery of affordable housing as part of a development can be reduced because of the viability of the development. Policy H2 of the LPSS accommodates this, provided the planning application is supported by a viability appraisal.</p> <p>2.8. In these circumstances, detailed viability appraisals would need to be submitted, reviewed and verified by an appropriately qualified specialist on behalf of the LPA. Where it is accepted that a policy compliant level of affordable is not viable, a viable level of affordable housing would then be agreed between parties.</p> <p>2.9. It is accepted that development costs and values can change over time, however it is not clear as to the circumstances whereby late stage reviews would be appropriate.</p> <p>2.10. Evidence should be provided to show whether late stage reviews do generally result in additional contributions being obtained and whether the characteristics of the development allocated / likely to come forward in compliance</p>

with in the LPSS would be of the type that would be appropriate for late stage reviews.

2.11. A late stage review would result in additional consultant costs to applicants after planning permission is granted. The risk that an additional and unknown level of contribution could be sought following planning permission creates uncertainty. This could jeopardise the delivery of development and the willingness to proceed on developments where there are known high development and infrastructure costs.

2.12. The national guidance on viability (Gov.uk) Paragraph: 009 Reference ID: 10-009-20190509 states (author emphasis):

Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.

2.13. Bloor Homes consider that the draft policy does not follow the guidance on the following grounds:

1. The draft policy says it will seek review mechanisms where the council considers it appropriate; this is not specific and open to interpretation; and
2. Neither the policy or the supporting text sets out a clear process and terms of engagement regarding how the viability would be reassessed over the lifetime of the development.

2.14. In terms of the first point, the policy can be improved by including criteria as to when late stage viability review would be inappropriate.

2.15. Paragraph 2.33 of the supporting text of the draft policy, does recognise that there may be certain developments where the potential for additional contributions is likely to be limited by the circumstances of the case. The policy should provide specific criteria or examples where this would be the case.

2.16. If the policy is not improved in this way, then determining whether a late stage review process is appropriate to be secured as part of a planning permission would be a subjective decision, which could be a matter for protracted

dispute and uncertainty for the applicant during the planning application stage.

2.17. As an alternative, if this is not accepted, Bloor Homes suggest the wording of the policy includes more explanation, detailing how the deferred contribution is to be calculated. Paragraph 2.40 of the supporting text of draft Policy H7 only refers to development value and build costs, which is considered to be too simplistic.

2.18. It is important that calculations take account of any deficit that schemes may be in at the outset, and not just any uplifts in value and build cost. Otherwise, the developer may be required to pay a contribution before the scheme has reached a viable position.

2.19. The calculation should also take account of the uplift in all relevant costs, not just build cost. Otherwise, this could mean that a developer could be liable for a contribution when a scheme remains unviable as uplifts in other costs, such as financing, are not taken into account.

2.20. On this basis, it is considered that any review should comprise a full review of the viability using the same methodology as the original viability appraisal submitted with the planning application. The findings of the two appraisals should then be compared to identify whether the viability of the development has improved and it is reasonable to require any financial contributions towards affordable housing provision.

2.21. Overall, whilst GBC may deem this to be an appropriate policy, and decide it should remain, Bloor Homes request that the policy should include criteria or examples of the type of development that would require late stage reviews and it must include detailed information as to how and when the review calculation will be undertaken.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/207

Respondent ID

20855809

Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H8: First Homes –comment</p> <p>2.22. Bloor Homes are supportive of the overall objectives of this policy and supports the goals within National Guidance on this topic. However, they raise a few concerns with the policy as worded as it is not positively prepared and could be made clearer, especially relating to where a housing mix has been previously agreed.</p> <p>2.23. Some outline planning permissions and/or S106 Agreements already set the tenure for affordable housing, and therefore influence future design and viability requirements for Reserved Matters Applications. As such, the policy wording should make reference to occasions whereby the affordable housing mix tenure has previously been agreed. This is particularly important as developers may have already agreed commercial terms with affordable registered providers in respect of a site that benefits from planning permission.</p> <p>2.24. As such, a requirement to revisit the affordable housing requirement secured in the permission could prejudice the agreement with the registered provider and ultimately the timely delivery of much needed affordable homes.</p> <p>2.25. In order to make the policy clearer in this respect, the following additional wording is suggested:</p> <p><u>7) Where an affordable tenure mix has already been agreed through a S106 or an Outline permission, then this policy should not apply to subsequent reserved matters or amendments</u></p>

	2.26. Overall, the inclusion of Bloor Homes suggested wording ensures that the policy is positively prepared, and would not cause concern to developers where a tenure mix has previously been negotiated and agreed by an existing planning permission.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/208
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P6/P7: Biodiversity in New Developments – object</p> <p>2.27. Bloor Homes object to this policy as presently worded as it is not justified or consistent with national policy as per paragraph 35 of the NPPF, however they support the overall objectives of this policy.</p> <p>2.28. The draft policy requires at least 20% BNG to be achieved for qualifying development. This is double</p>

the minimum requirement of the Environment Act 2021, which has a minimum requirement of 10%. Whilst the minimum requirement in the Act may change over time, there is no detailed justification in the DMP for GBC to require at least 20% BNG on qualifying development now / on its adoption.

2.29. How the BNG in the Environment Act is to be implemented and secure is still under review. At the time of writing there is a transition period to 2023 until the minimum BNG of 10% is required for every relevant development proposal. This transition period allows mechanisms and procedures to be created to enable BNG to be quantified and secured, and also ensures the development industry has the time to adapt and plan their sites and interests accordingly.

2.30. GBC’s proposal to double to minimum requirement to 20% independent of the novel national initiative could undermine the delivery of development sites, and therefore BNG.

2.31. Bloor Homes suggests that unless evidence is provided to demonstrate that the Borough is in need of enhanced biodiversity gains on the scale proposed, then the policy should be tied to the requirements of the Environment Act, or other national standard that maybe applied in the future. This would help developers plan strategically and provide certainty, which in turn facilitates the fast delivery of new homes.

2.32. In order to address the issues indicated above, Bloor Homes suggest that the policy is amended in the following way (strikethrough is suggested deletion and red indicated additional text):

“12) Qualifying development proposals are required to achieve a biodiversity net gain of at least ~~20~~ 10 per cent, or as per the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology”.

2.33. These changes would make the policy consistent with National Policy, and proportionate for developments in the Borough – whilst still ensuring improvements and mitigation to biodiversity.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/209

Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy P10: Land Affected by Contamination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P10: Land Affected by Contamination –comment</p> <p>2.34. Bloor Homes support the requirement of ensuring contamination is dealt with appropriately for public health and environmental purposes. However, the necessity of the policy is questioned, as GBC have the ability to include the requirements of the policy in their validation list. GBC would also have the ability to use planning conditions for some of the relevant requirements of the policy too.</p> <p>2.35. The policy is not necessary.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/210
Respondent ID	20855809
Respondent Name	Bloor Homes

Agent Name	Savills Planning (Robert Steele)
Section	Policy P11: Air Quality and Air Quality Management Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P11: Air Quality and Air Quality Management Area – object</p> <p>2.36. Bloor Homes objects to this policy due to its ambiguity and duplication of National Policy, such as Paragraph 185 of the NPPF. It is not clear to which applications Policy P11 applies, or how the policy applies proportionately to each application.</p> <p>2.37. It is noted that Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous, evident how ‘a decision maker should react to development proposals’.</p> <p>2.38. In Points 1 and 2 of the Policy, it is not clear how a decision maker should react to these statements, and there is no measure suggested to determine what would be needed to satisfy the statements.</p> <p>2.39. There also needs to be some further detail on what constitutes ‘significant impacts’, and how this can be measured by the LPA.</p> <p>2.40. Whilst Bloor Homes supports the aim of the policy, the requirements for an Air Quality Assessment to support a planning application should be set out clearer. GBC’s local validation list could be used as a mechanism to ensure relevant information is submitted with applications, as opposed to using adopted policy.</p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/211
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>P12: Water Quality, Waterbodies and Riparian Corridors – object</p> <p>2.41. Bloor Homes consider this policy is not positively prepared, and potentially seek works beyond the capability of developers and applicants. Whilst being aspirational, policies should also be deliverable (NPPF, Paragraph 16). Measures should be limited to works and improvements that are within the applicant’s control, as to make the policy deliverable.</p> <p>2.42. Therefore, Bloor Homes suggests the following change to the following elements of the Policy to ensure it is achievable:</p> <p><i>2) Development proposals that contain or are in the vicinity of a waterbody <u>within the applicant’s control</u> are required to demonstrate that they have explored opportunities to improve its chemical and ecological status/potential. Where a waterbody is covered by the Water Environment Regulations, proposals are required to align with the objectives of the Thames river basin district River Basin Management Plan.</i></p>

	<p>4) Development proposals which contain <u>a watercourse within the application boundary</u> are required to explore opportunities to improve and/or restore the flow and functioning of a watercourse it.</p> <p>8) Development proposals are required to identify opportunities for Natural Flood Management, creating wetland features and reconnecting rivers with their floodplain, <u>where appropriate, deliverable and assessed to be viable</u>, in order to restore natural processes, enhance biodiversity and help manage flood risk.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/212
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P13: Sustainable Surface Water Management –object</p> <p>2.43. Bloor Homes considers this policy is unnecessary duplication and replicates much of the themes from the NPPF</p>

	<p>Paragraph 159 – 169 on drainage, flooding and SUDS.</p> <p>2.44. SUDS in major developments as general practice is established by Paragraph 169 of the NPPF, including the steps that need to be followed.</p> <p>2.45. As such, Bloor Homes would recommend deletion of this policy and the Council to continue to be guided by national guidance in this regard.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/213
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness – object

2.46. Bloor Homes is a high quality housebuilder and good urban design is important to its brand and quality place making principles. Bloor is committed to delivering high quality developments which are informed by pre-application engagement with Local Planning Authorities and the wider community. However, it is considered that the proposed Policy D4 of the LPDMP repeats design guidance which is already available and a material considerations in the LPSS, various Supplementary Planning Documents and national guidance.

2.47. Policy D1 in the LPSS ensures a comprehensive design process for development in the Borough. The development plan is also supported by the Strategic Development Framework (SDF) Supplementary Planning Document (SPD), and includes design requirements and considerations at a site specific level.

2.48. Therefore, additional design based policy has the potential to contradict other planning policy, can become a hindrance that complicates the design process and delays the determination of planning applications ultimately impacting the timely delivery of much needed market and affordable homes. Both the LPSS Policy D1 and the SPDs (in addition to the National Design Guide and National Design Code which are already material considerations) will need to be considered for planning applications in the Borough and unnecessary duplication by way of an additional policy is unjustified.

2.49. On this basis, Bloor Homes question the need for another policy (i.e. draft Policy D4 of the LPDMP) addressing the same topic. The policy repeats guidance in the National Design Guide and so GBC should justify this repetition and duplication, otherwise it is inconsistent with paragraph 16e) of the NPPF which seeks to avoid unnecessary duplication.

2.50. In respect to Bloor Homes' live site interest, the existence of a SPD, which sets design and Masterplanning features for Policy A31 – Land South of Ash and Tongham, already provides the guidance to assist in the Masterplanning and delivery of a high quality design for the whole allocation. Notwithstanding this, Bloor's site interest benefits from outline planning permission. As such the SPD and existing Policy D1 of the LPSS is sufficient for GBC to assess and determine the planning application before them.

2.51. In summary, Bloor Homes consider that the relevant policies in the LPSS 2019 and guidance in the SPDs, NPPF, National Design Guide and Planning Practice Guidance, is sufficient for decision making purposes in respect of urban design. There is no absence in local policy, which prevents GBC securing high quality design within the Borough.

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/214
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5: Protection of Amenity and Provision of Amenity Space –object</p> <p>2.52. Bloor Homes creates new places and neighbourhoods, which result in a good quality of life for its residents, ensuring good levels of amenity and open space.</p> <p>2.53. Planning Policy should not be overly prescriptive in design terms as it can stifle innovation and good design. Policy D5 includes the following requirements:</p> <p><i>2) All new build residential development proposals, including flatted development, are expected to <u>have direct access to an area of private outdoor amenity space.</u></i></p> <p>2.54. This is not considered to be an absolute requirement to ensure amenity in developments, particularly for</p>

apartments. Residents of apartments which are sited close to public open space, new play areas or other landscaped areas would have access to these areas and so a requirement for a private / community area relating to the apartment block in every case is unnecessary.

2.55. The policy does not define what a private outdoor amenity space is in terms of whether it means private per apartment, or private / communal relating to the apartment block (it is also taken to mean something other than a balcony). Either way if there is public open space proposed or existing in the vicinity of the apartment block the value to residents of outdoor amenity space associated to the apartment block only would be minimal in this respect.

2.56. It is suggested the policy is amended to:

2) All new build residential development proposals, including flatted development, are expected to have direct access to an area of private outdoor amenity space.

2.57. The policy includes minimum standards for the size of balconies, which would provide private outdoor space to apartments. Bloor Homes has no comment on the minimum size requirement for balconies, however, the requirement for balconies to be designed as an integrated part of the overall design is not defined.

2.58. The supporting text refers to bolt on type balconies being unattractive, however this is a subjective statement, and the policy should not be prescriptive as to stifle innovation and good design. In some contexts such balconies might be appropriate and deliver a meaningful private amenity space in an efficient manner. This should be a matter relating to the design quality of developments as a whole, rather than being precluded in a specific policy.

2.59. It is suggested that the following part of the policy is deleted:

3) All balconies or terraces provided on new flatted development proposals are required to be:

a) designed as an integrated part of the overall design; and

a) a minimum of 4sqm.

2.60. Overall, this policy should be amended as per the suggestions above, in order to ensure that it is positively

	prepared (paragraph 35, NPPF).
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/215
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D5a: External Servicing Features and Stores
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5a: External Servicing Features and Stores - comment</p> <p>2.61. This policy requires bin storage, cycle storage and electric vehicle charging points to be integrated into the built form of the proposals. It is not clear what this means and whether it would preclude the use of outbuildings and sheds for those purposes.</p> <p>2.62. Good design requires innovation and flexibility to respond to characteristics and constraints of various development sites. In terms of electric vehicle charging points, in may not be practically possible to integrate them in</p>

	<p>the built form of development, particularly where the associated parking space is remote from the building (such as terrace housing with shared parking areas). As this is a relatively new technology, the policy should not be restrictive as it can hinder innovation and other solutions. The policy should remove the requirement for these items to be integrated into the built form.</p> <p>2.63. The policy should be amended to:</p> <p><i>“1) Development proposals are required to demonstrate that:</i></p> <p><i>a) bin storage, cycle parking and electric vehicle charging points, whilst being designed to meet practical needs, are integrated into the built form and should not detract from the overall design of the scheme or the surrounding area”.</i></p> <p>2.64. Overall, this policy should be amended as per the suggestions above, in order to ensure that it is positively prepared (paragraph 35, NPPF).</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/216
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D8: Public Realm
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

<p>Do you consider this section of the document complies with the Duty to cooperate?</p>	
<p>Comment</p>	<p>Policy D8: Public Realm –comment</p> <p>2.65. Bloor Homes largely supports this policy, albeit suggest modifications, to ensure that the policy is not overly onerous, and to ensure the policy is consistent with the LPSS. It is recognised that part of the policy duplicates National Policy, such as NPPF Paragraph 131.</p> <p>2.66. It is important that the public realm includes tree and landscaping for all sorts of purposes, including biodiversity, good urban environment and shading. However, there can be technical constraints and other planning considerations that all contribute to the decision making process. The planning balance includes making efficient use of land, stringent highway requirements (which generally only permits certain trees), and as well as achieving an attractive environment. Therefore, flexibility is important to ensure the right decisions are made in this respect.</p> <p>2.67. The following amendments are proposed (red text should be added, and strikethrough deleted):</p> <p><i>2g) new streets should seek to are tree-lined incorporate tree planting where practically achievable, unless there are clear, justifiable and compelling reasons why this would be inappropriate, and their long-term maintenance is secured;</i></p> <p>2.68. These amendments are considered to improve the policy and ensure that it is consistent with adopted planning policy. In addition, it would be inappropriate in some locations to enforce that streets are tree lined (as outlined in NPPF footnote 50), however it is acknowledged that tree planting should be incorporated where practically possible.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/217</p>

Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D12: Sustainable and Low Impact Development - object</p> <p>2.69. Bloor Homes object to this policy on the basis that it is not required and duplicates on matters that are covered by the LPSS, Climate Change, Sustainable Design, Construction and Energy SPD, the NPPF and legislation.</p> <p>2.70. Policy D2 of the LPSS : Climate Change, Sustainable design, Construction and Energy of the LPSS already includes many of the requirements specified in the LPDMP Policies D12, D13, D14 and D15. Furthermore, the recently adopted Climate Change, Sustainable Design, Construction and Energy SPD already provides guidance to assist developers in complying with the requirements of Policy D2 of the LPSS.</p> <p>2.71. On this basis, it is not considered necessary to include further policies within the LPDMP. In addition, it would add considerably to the already lengthy and detailed policies and guidance on sustainable development of the GBC development plan (including relevant SPD).</p> <p>2.72. Alternatively, a simple approach would be for the policy to state that the requirement for carbon emissions reduction and efficiency of buildings should be in accordance with the latest Building Regulations. This is the best mechanism for securing future changes in the interest of transparency and consistency. The Government is committed to a net zero policy and so Building Regulations are likely to alter overtime, but this is subject to wide consultation</p>

	<p>and transparent lead in times. This helps the development industry in preparing and reduces uncertainty based on location in this respect.</p> <p>Policy D12 contains similar provisions as set out in the LPSS and aforementioned SPD, the policy should be deleted.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/218
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D13: Climate Change Adaptation - object</p> <p>2.73. Similarly, to the points raised in regard to policy D12, this policy overlaps and repeats the LPSS and Climate Change, Sustainable Design, Construction and Energy SPD.</p>

	Policy D13 contains similar provisions as set out in the LPSS and aforementioned SPD, the policy should be deleted.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/219
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D14: Carbon Emissions from Buildings - object</p> <p>2.74. This policy introduces a requirement for new dwellings to demonstrate a reduction in carbon emissions by 31%. This is a considerable increase compare to the requirements in Policy D2 of the LPSS (which requires 20%).</p> <p>2.75. Whilst the supporting text of Policy D14 refers to new national standards proposed by government in the forthcoming changes of Building Regulations. At the time of writing, the requirement is not part of the Building</p>

	<p>Regulations and instead is only part of a government consultation.</p> <p>2.76. On this basis it is subject to change, and so it Bloor Homes does not consider it appropriate for GBC to introduce such an increase in carbon emission reduction targets at a local level. This would have repercussions on the viability of new development and would not allow Bloor Homes to adapt and innovate in line with the trajectory of national standards.</p> <p>2.77. GBC commissioned Local Plan Local Plan: Development Management Policies & Stage 1 Community Infrastructure Levy (CIL) Viability Assessment December 2021 by Dixon Searle Partnership, recognises the increased burden to costs in respect of GBC’s proposal to go beyond national standards in this respect. Rather than the report suggesting the Policy is removed, it suggests that any future CIL levy should be applied to take account of such additional costs. It also suggests that further testing is required for other typologies to fully understand the viability impact of the policy (paragraph 3.1.14)</p> <p>2.78. Bloor Homes is committed to sustainable construction and its role in tackling climate change. However, the carbon emission reduction targets need to be applied in a way that ensures construction techniques can adapt and innovate with sufficient time for this to take place. It is more appropriate for GBC to adopt the increase in targets set by Government via the Building Regulations, as it is subject to much wider industry consultation on a national scale.</p> <p>2.79. The Policy would also result in an inconsistency with Policy D2 of the LPSS, which whilst referring to a 20% reduction in carbon emissions does allow for the minimum requirement to change subject to Building Regulations. This is considered to be appropriate.</p> <p>Policy D14 and in particular Part 4 should be deleted.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/220</p>
<p>Respondent ID</p>	<p>20855809</p>

Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets; Policy D17 Listed Buildings; Policy D18 Conservation Areas; Policy D19 Scheduled Monuments - object</p> <p>2.80. As has been mentioned in this representation, it is clear that local policies should avoid unnecessary duplication of policies and guidance. The NPPF, in Chapters 15 and 16, provides clear and legible guidance on how to approach Heritage matters, how to balance harm and how a decision maker should assess proposals that cause harm.</p> <p>2.81. Proposed policies D16, D17, D18 and D19 do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p> <p>2.82. If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/221
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D17: Listed Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets; Policy D17 Listed Buildings; Policy D18 Conservation Areas; Policy D19 Scheduled Monuments - object</p> <p>2.80. As has been mentioned in this representation, it is clear that local policies should avoid unnecessary duplication of policies and guidance. The NPPF, in Chapters 15 and 16, provides clear and legible guidance on how to approach Heritage matters, how to balance harm and how a decision maker should assess proposals that cause harm.</p> <p>2.81. Proposed policies D16, D17, D18 and D19 do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p> <p>2.82. If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.</p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/222
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D18: Conservation Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets; Policy D17 Listed Buildings; Policy D18 Conservation Areas; Policy D19 Scheduled Monuments - object</p> <p>2.80. As has been mentioned in this representation, it is clear that local policies should avoid unnecessary duplication of policies and guidance. The NPPF, in Chapters 15 and 16, provides clear and legible guidance on how to approach Heritage matters, how to balance harm and how a decision maker should assess proposals that cause harm.</p> <p>2.81. Proposed policies D16, D17, D18 and D19 do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p> <p>2.82. If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/223
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D19: Scheduled Monuments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets; Policy D17 Listed Buildings; Policy D18 Conservation Areas; Policy D19 Scheduled Monuments - object</p> <p>2.80. As has been mentioned in this representation, it is clear that local policies should avoid unnecessary duplication of policies and guidance. The NPPF, in Chapters 15 and 16, provides clear and legible guidance on how to approach Heritage matters, how to balance harm and how a decision maker should assess proposals that cause harm.</p> <p>2.81. Proposed policies D16, D17, D18 and D19 do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p>

	2.82. If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/224
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy D20: Non-designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D20: Non-designated Heritage Assets - comment</p> <p>2.83. Similar comments are given for Policy D20 as other heritage policies. Bloor Homes believe it is not necessary to have a specific policy on this and it should be deleted, as this can be covered in Policy D3 of the LPSS and NPPF. There is nothing unique in the policy that is not already covered in national guidance and other legislation.</p> <p>2.84. Bloor Homes do however suggest that non-designated heritage assets are defined as those which have been</p>

	<p>specially defined as such through an appropriate source, made accessible to the public by the plan-making body. This could be by way of a Local List, or clear criteria for identification over a period of time or through consultation. As written in the PPG, identification should be based on “sound evidence”. Thus, clear process of these assets would help developers understand if surrounding features can be considered as non-designated heritage assets.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/225
Respondent ID	20855809
Respondent Name	Bloor Homes
Agent Name	Savills Planning (Robert Steele)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID11: Parking Standards – object</p> <p>2.85. It is noted that GBC is proposing maximum parking standards for strategic and non strategic sites. It appears from the supporting text of the policy, that the maximum standards is proposed to be a tool to help meeting the Governments shift to net-zero policy, or in other terms to help reduce private car provision.</p>

2.86. GBC will not be able to alter the public need / habits and desire for private cars on its own; and instead this should be the role for national government, who has more ability to provide incentives and / or restrictions to promote that change.

2.87. Whilst maximum standards might be appropriate in urban settings, the Borough has a broad mix of urban, suburban and rural areas. Many of the allocated sites within the LPSS are edge of settlement or greenfield developments, which historically are not in areas of high public transport availability or usage. Whilst Surrey County Council and GBC may have aspirations to increase public transport throughout the Borough, this is unlikely to be in the short to medium term; nor alongside the delivery of the allocated and proposed development within the LPSS.

2.88. If not set correctly maximum parking standards can lead to poor environments due to resultant indiscriminate parking on street, particularly where the level of public transport availability has not increased alongside the delivery of new development.

2.89. Bloor Homes considers it is more appropriate to provide choice to new residents and the level of parking the market desires. This would have to be judged alongside urban design quality and principles (such as ensuring developments are not dominated by parking), but the use of minimum standards and good urban design policies and guidance; is usually the best way to control this and result in high quality long term settings for new developments.

2.90. The LPDMP should include evidence to show where and how maximum parking standards have been used successfully to promote public transport, but to also consider the potential implications on the long term urban design environment of new developments.

2.91. It is considered that the level of parking should be determined by market requirements and controlled by urban design policies and principles. The use of public transport can be promoted independently from parking provision, in order to provide choice to residents.

2.92. Bloor Homes has provided additional comments on the Parking SPD 2022 consultation which are also relevant to the LPDMP Policy ID11.

It is suggested that the use of maximum standards for residential development is removed from the LPDMP. Comments on the representation to the Parking SPD should also be taken into account, particularly in respect

	to garage sizes.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/18
Respondent ID	8562049
Respondent Name	British Sign & Graphics Association (Mr Chris Thomas)
Agent Name	
Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D7 and supporting text has been thoroughly revised from the Issues and Options version. The changes are refreshingly thoughtful and a significant improvement on the wholly negative sentiments of the earlier version. The British Sign and Graphics Association are glad to be able to support Policy D7 and supporting text.
What changes do you suggest should be made to the document?	Minor improvements to the language would make the document more readable, eg in para 5.57, "Outdoor advertising is a very...." would read better ("has become" implies something recent - advertising has been important since ancient times - even the Sumerians used it!). In 5.59, "this policy only applies to advertisements" (plural). Para 5.65 "cumulative" and "accrual" mean the same thing - perhaps "cumulative impact". Para 5.68 "statutory" should be "statutorily". Para 5.69 final sentence "advertisements" needs an apostrophe. Para 5.70 "advertisement" and "signage"

	are the same thing. Simply "Where an advertisement is to be fixed to a statutorily listed building ..." (for clarity - it does not apply to locally listed buildings). In paragraph 5.71 "reasonably required" should be deleted - it is meaningless. Who is to decide what is "reasonably required". This is the applicant's business and not for the Council to determine. If the applicant think it is needed, then it is not for the Council to question (as advised in PPG paragraph ID 18b-027-20140306). Consequently, in para 5.72 "Where illumination is considered to be acceptable" must also be deleted. In the same paragraph "is hidden from view" might be replaced with "is concealed as far as reasonably practical" - complete concealment might not be possible (ie a cable affixed to a concrete wall).
Files	
Comment ID	LPDM21B/154
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H5: Housing Extensions and Alterations including Annexes.</p> <p>We support this policy.</p> <p>In relation to annexes we recommend firm indication in the policy or the supporting text that conditions will be added to any permission granted to ensure that the annex cannot be used as a separate dwelling.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/155
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H6: Housing Conversion and Sub-division.</p> <p>We recommend that the wording of 1c is tightened to ensure that ‘sufficient’ means specific reference to Neighbourhood Plan requirements and SPDs to ensure adopted minimum standards are adhered to.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/156
Respondent ID	8581505

Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H7: Review Mechanisms</p> <p>We support the introduction of a review mechanism into the provision of affordable housing. This should specifically mention the need for an independent assessor to undertake the audit.</p> <p>However, in relation to 3a we recommend the review should occur much earlier in the process and should start at, for example, 30% of sales or lease of market homes, not 75%.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/157
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy H8: First Homes

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H8: First Homes</p> <p>We are concerned that the wording of section 4 is ambiguous. Ie: Does it mean that a settlement of 40 homes, allows an additional 40 homes (the same as the size of the whole settlement) or the same size as the house next door? In either case it's simply not worded correctly and is very unclear.</p> <p>We recommend a specific area limit e.g., 1 acre as was found in the 2003 local plan for exception sites, and a specific reference to the need for new development to meet all other development control criteria.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/158
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy E11: Animal-related Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy E11: Animal-related Development</p> <p>We support this policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/159
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy P6/P7: Biodiversity in New Developments

	We are concerned that this policy will be superseded by the requirements of the new Environment Act 2021, particularly in relation to net Gain requirements.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/160
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy P8/P9: Protecting Important Habitats and Species We support this policy.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/161
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy P10: Land Affected by Contamination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P10: Land Affected by Contamination</p> <p>We support the general thrust of this policy. However, it is unclear the extent to which the Council would be prepared to come to a different conclusion where there is a question over any submitted Contamination reports within a planning application which fails to meet this requirement. Is this policy enforceable and would the Council ask a third party consultant to review it?</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/162
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	

Section	Policy P11: Air Quality and Air Quality Management Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P11: Air Quality and Air Quality Management Areas</p> <p>We would pose the following questions in relation to this policy</p> <ul style="list-style-type: none"> • What is the threshold required to improve air quality and at what distance to sensitive receptors? • What is the intention of the council to establish baselines across the LPA area? • In relation to section 8, It is unclear what the authority would do with the contributions collected. This requires specification eg: for Tree Planting, Sound Barriers, Air filtering plants? <p>We expect to see all base air pollution measurement submitted as part of the planning application. Documented proof that the developer has positively explored options to meet current guidelines on maximum air pollution levels should be submitted as part of the application paperwork.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/163
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	

Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P12: Water Quality, Waterbodies and Riparian Corridors</p> <p>We support this policy.</p> <p>Section 3 should include all non-residential as well as residential developments with reference to the Water resources in the South East (WRSE) plan for water conservation. https://www.wrse.org.uk/</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/164
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P13: Sustainable Surface Water Management</p> <p>We support this policy but can find no mention of grey water recycling for toilet flushing.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/165
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy P14: Regionally Important Geological / Geomorphological Sites
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy P14: Regionally Important Geological / Geomorphological Sites

	<p>The word ‘policy’ missing from is heading.</p> <p>We are concerned this policy is too minimalist and takes a ‘hands off approach’. For example, “Every effort” is not sufficient within Clay Chalk mix areas including Blackwell Farm and within the Gravel Clay areas of the Wey Navigation Valley.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/166
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness</p> <p>Section 2 should also make reference to Neighbourhood Plans, especially where local distinctiveness is recorded within the Neighbourhood Plan.</p>

	Master plans and design codes should be agreed and signed off by local interest groups such as Community associations, Neighbourhood forums and Parish Councils.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/167
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5: Protection of Amenity and Provision of Amenity Space</p> <p>Protection of amenity and provision of amenity space should include stated minimums with due reference to national standards and should be minimum usable space not overall external dimensions. The pandemic has taught us the value of private amenity space.</p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/168
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D5a: External Servicing Features and Stores
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5a: External Servicing Features and Stores</p> <p>We support this policy but caution that this area should not be included within the private amenity space of policy D5</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/169
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	

Section	Policy D6: Shopfront Design and Security
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D6: Shopfront Design and Security</p> <p>We support this policy but, for the avoidance of doubt, request that ‘shop front’ is redefined such that corner shops include both front and side elevations visible in the street scene.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/170
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>Policy D7: Advertisements, Hanging Signs and Illumination</p> <p>We support this policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/171
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D8: Public Realm
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D8: Public Realm</p> <p>We support this policy.</p> <p>However, we suggest further safeguards to ensure that the public realm is clearly identified and retained in public</p>

	ownership. A register of such land must be made available in the public domain; e.g. the council web site.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/172
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D9: Residential Infill Development Proposals</p> <p>In relation to section 2 we question if this is legally enforceable, and we suggest a land registry Title block date is established such that any attempt to sub divide the plot, say, one year before submission of the ‘first’ planning application is clearly identified and therefore still subject to these policy requirements.</p> <p>The policy should make Reference to Neighbourhood Plans particularly where they have policies on Infilling and these should take precedence in the Neighbourhood Plan areas</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/173
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D10: Noise Impacts
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D10: Noise Impacts We support this policy.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/174
Respondent ID	8581505

Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D10a: Light Impacts and Dark Skies</p> <p>We support this policy</p> <p>Light generating development should be defined more concisely.</p> <p>There should be a policy that any development with any lighting should be shaded such that No light escapes outside the property line or the overall development. Ie complying with latestDark skies Government Guidance Paragraph: 001 Reference ID: 31-001-20191101</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/175
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	

Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D11: The Corridor of The River Wey and Godalming Navigations</p> <p>Section 1 C states a desire to open up views which contradicts section 1A, which seeks to conserve and enhance its visual setting. This should be deleted from section 1C.</p> <p>Section 2 which seeks to ‘improve public access’ is contradictory as it will destroy the area downstream below Stoke Lock in its entirety by changing the distinct character of the Navigations including its current semi enclosed visual setting, in direct contradiction of section 1A.</p> <p>We support the protection of the Heritage asset of the river but strongly suggest that the town centre area and the country side areas are separated in policy terms such that the Countryside is not urbanised in anyway I.e. above the Tumble weir and below Stoke Lock should be classed as countryside.</p> <p>In relation to the Outline planning permission for the Weyside Urban Village (WUV) approved plans show a 3-metre-wide cycle and pedestrian path in place of the current Tow- path.</p> <ul style="list-style-type: none"> • Either hard-banks will be used, destroying the heritage of the Navigation, or • To meet current EA practices of softening the banks, five metres will be required which is not available in some sections, (because a stand-off of 2 metres is required on soft banks to allow for erosion). • there is also an EA requirement to not ‘use’ the river bank for a lateral distance of 10 metres. <p>This policy fails to take any of this into consideration.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/176
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D12: Sustainable and Low Impact Development Section 2a needs to be defined. In reality, as there is no softwood saw mill within 50 miles of Guildford or Large capacity Brickworks within 100 miles this is an unsustainable statement.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/177
Respondent ID	8581505

Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	We support this policy to a point. We have concerns over the practical implications encompassed by the policy. We recommend additional wording to require the policy to be applied realistically and proportionately.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/178
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D14: Carbon Emissions from Buildings</p> <p>This policy is of its ‘time’, and next year may be superseded. The wording of the policy should be rewritten to ensure it remains future proofed.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/179
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	The word Policy is missing from the title. This policy requires future proofing to keep up with technology.
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/180
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage assets</p> <p>We are broadly supportive of the policy. However, we think reference should be made Neighbourhood Plans and local amateur and professional historians as reference sources for specific sites and as consultees on planning applications.</p> <p>Section 3 implies harm to heritage assets is acceptable. “considered” needs to replace with “assessed”.</p> <p>Desk top Heritage assessments are not acceptable as part of planning applications. Applications must be supported by a full assessment including a site visit by a historian.</p> <p>We recommend this because by way of example we note the very poor treatment in both the WUV and New STW application documentation of the Historic Flowing River, which is now accepted as a significant heritage asset, by the council and the Surrey History centre.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/181
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D17: Listed Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D17 Listed Buildings Should locally listed and national Statutory listed Buildings be included as an appendix?
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/182
Respondent ID	8581505

Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D18: Conservation Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D18: Conservation Areas We support this policy.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/183
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D19: Scheduled Monuments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D19: Scheduled Monuments</p> <p>We support this policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/184
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D19a: Registered Parks and Gardens
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D19a: Registered Parks and Gardens

	We support this policy.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/185
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D20: Non-designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D20: Non-designated Heritage Assets</p> <p>We support the broad thrust of this policy but section 1, should include reference to Neighbourhood Plans.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/187
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy D21: Enabling Development and Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D21: Enabling Development and Heritage Assets</p> <p>We support this policy.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/188
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is	

Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID5: Protecting Open Space</p> <p>Designated Open Space should under ALL circumstances remain as Open space, simply because any increase in population density brought about by development, enabled by this Local Plan, by its very nature will remove non designated open space and require more designated open space to serve the new development residents.</p> <p>Thus, this policy should be reworded to that effect.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/189
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID6: Open Space in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID6: Open Space in New Developments</p> <p>This policy should include and designate New Local Green Spaces as part of the development process. These should include animal corridors across the development.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/190
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID8: Community Facilities
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID8: Community Facilities</p> <p>We support this policy but are concerned the phrase “conveniently accessed” is not defined as a distance.</p>

	<p>This could result in large travelling distances and closure of the existing facilities to the detriment of existing communities.</p> <p>We caution that this should not be used as an excuse to not facilitate supply of such new or needed community facilities in the adjacent communities.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/191
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID9: Retention of Public Houses
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID9: Retention of Public Houses</p> <p>We support this policy.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/192
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network</p> <p>We support this policy in principle but studies show that the use of cycle lanes is very limited and removes valuable road space for other vehicles which is already limited within Guildford. We would be less reticent about this policy if it was not already known that major underground infrastructure has to be replaced in the near future to enable developers to meet housing targets.</p> <p>The Policy also makes reference to sustainable movement corridors which have not been out for public consultation since inception some five years ago. This policy is therefore premature</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/193
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID 11 Parking standards.</p> <p>We support the hierarchy of Neighbourhood Policy's taking precedence over local plan policies, but are extremely disappointed that the general parking standards have the word Maximum included within them. When it is very clear that research done by Neighbourhood Forums, and the resulting Neighbourhood Plans democratically voted on, justify the need for Minimum standards for their communities. To accept that Neighbourhood Plans are correct, then claim everyone else in the Borough should suffer a maximum standard is incoherent and disjointed</p> <p>The inclusion of maximum parking standards, for example on the WUV, means the only transport method and direction of travel on a rainy day is into Guildford town centre by bus. We estimate that 1,500+ residents at WUV will need to catch one of at least 12 buses running continuously between 06:30 and 09:30 into the town. Who is funding these buses, given that a bus operator recently withdrew from the town?</p> <p>Furthermore, there is no integrated bus link to the train station resulting in a walk of over 700 meters to the train station in the wet.</p> <p>No account is taken for two people in the same household on shifts working in Woking and Aldershot neither will</p>

	<p>have a travel facility.</p> <p>The policy needs to be supported with firm Monitoring indicators and Quantifiable measured real-world Targets. – with reference to real life scenarios as demonstrated above.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/399
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>The suggested use of maximums for parking standards in non- Neighbourhood Plan areas in the Borough are opposed. Surrey County Council, as Highway Authority, states in its own guidance that 'it is recognised that the county exhibits a wide range of social and economic circumstances that necessitate a flexible approach to identifying appropriate</p>

	levels of car parking provision.' Imposing artificial maximums across the Borough via this SPD is counter-intuitive to this need for flexibility.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/400
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>The adoption of borough-wide maximum standards outside of neighbourhood plan areas is not in compliance with the NPPF as no 'clear and compelling' justification has been presented in the parking Topic Paper or SPD. Indeed, the parking topic paper acknowledges a direct trend between increased housing development and increased car ownership. No evidence has been presented in the Topic Paper to suggest future trends will differ.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/401
Respondent ID	8581505
Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>The general turnaround in the Council's position between Regulation 18 and Regulation 19 stages has not been adequately explained or justified.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/402
Respondent ID	8581505

Respondent Name	Burpham Neighbourhood Forum (Mr Jim Allen)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>We oppose the continued use of half parking spaces (0.5) spaces in standards for all developments. The SPD should specify that such requirements be rounded up, not down, in all circumstances.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/284
Respondent ID	26123073
Respondent Name	CBRE (Mrs Alison Tero)
Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Submitted on behalf of Julian Harris and Nicola Harris, land owners of the Land at Bridge End Farm, Wisley.</p> <p>Housing Policies</p> <p>The viability review mechanisms set out in draft Policy H7 requires an additional mid-stage review prior to implementation of the second half or later phase/s of the development for large-scale phased development. Whilst a definition is provided that large-scale phased development constitutes schemes that deliver 500 or more residential units in a number of phases, further clarification should be added for strategic sites that where different landowners and applications are submitted this does not meet the threshold of a large-scale phased development. For example where planning permission for a 200 unit scheme would not trigger a mid-phase review.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/285
Respondent ID	26123073
Respondent Name	CBRE (Mrs Alison Tero)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Submitted on behalf of Julian Harris and Nicola Harris, land owners of the Land at Bridge End Farm, Wisley.

Biodiversity

Draft Policy P6/P7 sets out the requirements of new development in respect of biodiversity. Parts 12 to 17 of the draft policy refers to Biodiversity Net Gain (BNG), requiring qualifying developments to achieve at least 20% or the advised national minimum amount whichever is greater. The Environment Act 2021 introduces a statutory requirement of 10% BNG increase, however further detail on the mechanisms to achieve BNG are subject to secondary legislation. In the absence of the secondary legislation to understand the full permeations and implications associated with the various mechanisms set out in the mitigation hierarchy, it is considered that the uplift to a minimum of 20% is not justified or effective. Therefore the draft policy conflicts with the Local Plan soundness tests in paragraph 35 of the National Planning Policy Framework (NPPF) (2021).

Whilst the BNG component of the policy is to be applicable for ‘qualifying’ sites, part 1 of draft Policy P6/P7 requires all proposals including those exempt from the minimum biodiversity net gain to seek maximum biodiversity gain and to follow the mitigation hierarchy. The hierarchy set out in supporting paragraph 4.19 reflects the hierarchy of the Environment Act for BNG including compensation, however it is considered the supporting text should be amended to refer this applies to qualifying sites only.

It is also considered that reference to the transitional arrangements set out in the Environment Act should be referenced in the supporting text to the draft Policy.

What changes do you suggest should be made to the document?

Files

Comment ID	LPDM21B/286
Respondent ID	26123073
Respondent Name	CBRE (Mrs Alison Tero)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Submitted on behalf of Julian Harris and Nicola Harris, land owners of the Land at Bridge End Farm, Wisley.</p> <p>Achieving High Quality Design and respecting Local Distinctiveness</p> <p>Draft Policy D4 (7) notes that development proposals are expected to be designed so as not to hinder the potential future delivery of adjoining development sites. In the case of the Strategic Sites, it is considered that this should be strengthened in policy to be a required to ensure the effective delivery of multiphase, multi ownership developments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/287
Respondent ID	26123073

Respondent Name	CBRE (Mrs Alison Tero)
Agent Name	
Section	Policy ID6: Open Space in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Submitted on behalf of Julian Harris and Nicola Harris, land owners of the Land at Bridge End Farm, Wisley.</p> <p>Open Space</p> <p>The NPPF supports access to a network of high quality open spaces recognising the importance of these areas for the health and well-being of communities and wider social benefits. Our client supports the commitment by GBC in delivering a range of open spaces as part of new developments, however draft Policy ID6 is considered to be unclear in respect of the relationship between allotments and community growing space.</p> <p>The definition for allotments set out in paragraph 6.17 does not delineate if the allotment standards are for multiple plots or individual plots. Notwithstanding this, the supporting text in paragraph 6.36 states that community growing space will not be considered as a substitute for the provision of allotments on strategic sites. This is considered to conflict with the flexibility point noted in paragraph 6.30 which refers draft Policy ID6 could result in a proliferation of spaces which are poorly located/ designed and impractical to manage. On strategic sites which may come forward in phases such as Wisley Airfield, it is considered that flexibility to the provision of allotments and/or community garden space should be included, recognising the 95% of household survey respondents to the Open Space, Sport and Recreation Assessment (2017) who said they never use allotments. Flexibility for strategic sites would ensure the masterplan and subsequent applications, deliver an appropriate range of open space typologies across larger sites</p>

	which would not undermine the overall design and character of the area.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/308
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 2 - Policy H5: Housing extensions and alterations</p> <p>Do you agree with the preferred option to address housing extensions and alterations in Guildford?</p> <p>Compton PC agrees with the preferred option,</p> <p>Do you have any other comments or suggestions?</p>

	<p>We would like to see the policy strengthened to ensure that housing extensions and alterations respect the surrounding landscape, especially in designated Areas of Great Landscape Value and Areas of Outstanding Natural Beauty (and the land forming their settings) and conservation areas.</p> <p>The terms ‘acceptable or unacceptable’ in planning terms are vague.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/309
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 3 - Policy H6: Housing conversion and sub-division</p> <p>Do you agree with the preferred option to address housing conversion and sub-division in Guildford?</p>

	<p>Compton PC agrees with the preferred option to address housing conversion and sub-division</p> <p>Do you have any other comments or suggestions?</p> <p>The terms ‘acceptable or unacceptable’ in planning terms are vague.</p> <p>In addition to ensuring conversions do not harm the character of the locality they should also not harm the character of the property</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/310
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy H7 Review Mechanisms

	<p>Any potential viability review of affordable housing ratios should be in the public domain and only permissible in exceptional circumstances</p> <p>When affordable housing ratios are lower than agreed, the council should reserve the right to postpone development if by doing so a greater level of affordable housing could be delivered in the future</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/338
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H8: First Home</p> <p>CPC agrees with the policy to set a minimum percentage of discounted housing in perpetuity for first time buyers and would like to see a criteria for all affordable housing</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/339
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy E11: Animal-related Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 5 - Policy E11: Horse-related development</p> <p>Do you agree with the preferred option to address horse-related development in Guildford?</p> <p>Compton PC agrees with the preferred option to address horse-related development.</p> <p>Do you have any other comments or suggestions?</p> <p>An additional policy that ensures owner details for horses/ land used for animal grazing is essential. Compton PC has experienced animals escaping (where fencing is not fit for purpose), which has in turn caused road traffic accidents. There have also been incidents where several horses died after being left to graze in a field with ragwort. The landowner lived 'off-shore' and the horses belonged to travelers, hence no-one could readily be held accountable.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/340
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 6 - Policy P6: Biodiversity in new developments</p> <p>Do you agree with the preferred option to address biodiversity in new developments in Guildford?</p> <p>Compton PC does not believe that the Policy P6 goes far enough. We feel that the buffer zones around environmentally sensitive areas should be specified, and that these should take into account the type of development adjacent to a particular area. For example a buffer zone of 50m should be introduced with regard to any road, whereas a narrower buffer might suit a cycle way or sports ground.</p> <p>We also feel that words such as “expects” and “should” are too weak and will give developers too much ‘wiggle room’. These should be replaced in all instances by “requires” and “must”. For, example, The policy “<u>requires</u> proposals to be guided by other national, regional and local biodiversity strategies.” And “Where sites contain or are</p>

adjacent to sensitive habitats, appropriate buffers and, where necessary, barriers must be incorporated in order to protect the habitats from the impacts of the development, including those resulting from recreational use. Schemes should be designed to avoid light pollution. If a lighting strategy is provided, it must take account of the potential impacts on wildlife.

Question 7- Policy P7: Biodiversity net gain

Do you agree with the preferred option to address biodiversity net gain in Guildford?

Compton PC agrees with Policy P7 re biodiversity net gain and welcomes the Council's aim to increase biodiversity net gain from 10 to 20 per cent.

Do you have any other comments or suggestions?

No further comments.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/341

Respondent ID

26073857

Respondent Name

Compton Parish Council Local Plan Sub-Committee (Karen Stevens)

Agent Name

Section

Policy P8/P9: Protecting Important Habitats and Species

Do you consider this section of the document is Legally Compliant?

Do you consider this section of the document is

Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Question 8 - Policy P8: Woodland, trees, hedgerows and irreplaceable habitats

Do you agree with the preferred option to address woodland, trees, hedgerows and irreplaceable habitats in Guildford?

- Whilst Compton PC supports GBC’s aim to protect irreplaceable habitats, the PC does not feel that the wording of Policy P8 provides this protection. In particular Bullet Point 2, which allows the loss, damage or deterioration of irreplaceable habitats by development, if “there are wholly exceptional reasons and the exceptional benefits of the development proposal outweigh the loss of the habitats, demonstrated through unequivocal and credible evidence”. The term “exceptional” is a subjective and Compton PC feels that these “exceptional reasons” and “exceptional benefits” need to be spelt out for the policy to have meaning.

Do you have any other comments or suggestions?

Compton PC would like to see the buffer zone around ancient woodland increased to 50m in line with recommendations by the Woodland Trust We also disagree with the suggestion that a road should be used to separate ancient woodland from housing development. Building a road adjacent to ancient woodland could have a negative impact on this sensitive environment in terms of noise, air pollution and wildlife.

The PC is concerned that Point 5 is too weak and the words “Site design is **expected** to incorporate significant trees plus their root structures and understory within the public realm” should be changed to “Site design is **required to** incorporate significant trees ...).

Question 9 - Policy P9: Priority species and priority habitats on undesignated sites

Do you agree with the preferred option to address priority species and priority habitats on undesignated sites in Guildford?

	<p>Compton PC does not believe Policy P9 gives sufficient protection to priority species and habitats.</p> <p>Do you have any other comments or suggestions?</p> <p>The mitigation hierarchy gives developers “wiggle room” to simply provide a “compensatory habitat”. In some cases, providing alternative habitats is not a solution and the policy does not address this. Woodland, for example, may need to be hundreds of years old before it creates conservation habitat of a comparable quality to that which is being lost or harmed.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/342
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy P10: Land Affected by Contamination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Question 10 - Policy P10: Contaminated land

	<p>Do you agree with the preferred option to address contaminated land in Guildford?</p> <p>Compton PC agrees with Policy P10 with regard to contaminated land.</p> <p>Do you have any other comments or suggestions?</p> <p>In addition to the policies laid out, greater resources in the enforcement department would help avoid contamination taking place. Compton/Artington has experienced two large illegal landfill scenarios where earlier intervention would have reduced the impact.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/343
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy P11: Air Quality and Air Quality Management Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment

Question 11 - Policy P11: Air quality and Air Quality Management Areas

Do you agree with the preferred option to address air quality and Air Quality Management Areas in Guildford?

Compton PC agrees with Policy P11 with regard to AQMAs.

Do you have any other comments or suggestions?

We would suggest replacing the sentence in point 1 “In particular, development proposals within or adjacent to an Air Quality Management Area (AQMA) will be expected to be designed to mitigate the impact of poor air quality on future occupiers” with “In particular, development proposals within, adjacent to, or impacting on, an Air Quality Management Area (AQMA) will be required to be designed to mitigate the impact of poor air quality on existing and future occupiers”.

The policy acknowledges the impact of biomass, but not traffic, which is the main culprit at present. An independent assessment of the impact of a new site on its surrounding area should therefore include the accumulative impact of pollution from traffic on existing AQMA’s and borderline areas.

We would also like to see the re-establishment of a permanent air quality monitoring station.

AQAPs should have a time frame. Without this monitoring can go on for many years and actions that are ineffective on their own (such as the no right turn sign into Down Lane, which is only adhered to by buses but is not policed / upheld) remain in place, buying time until technology improves which is unhelpful for the here and now and against National policy.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/344

Respondent ID

26073857

Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 12 - Policy P12: Water resources and water quality</p> <p>Do you agree with the preferred option to address water resources and water quality in Guildford?</p> <p>Compton PC agrees with Policy P12.</p> <p>Do you have any other comments or suggestions?</p> <p>Point 3 is too vague. The requirement for development that will impact on the underground and surface water courses to “contribute towards” those water bodies maintaining or achieving ‘Good Ecological Status’ does not go far enough. Developers should be required to fund mitigation measures in full. Simply asking for a “financial contribution” could result in a very small contribution being made.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/345
Respondent ID	26073857

Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 13 - Policy P13: Sustainable Drainage Systems</p> <p>Do you agree with the preferred option to address sustainable drainage systems in Guildford?</p> <p>Compton PC agrees with Policy P13</p> <p>Do you have any other comments or suggestions?</p> <p>The policy should be extended to ensure that SuDs schemes are required to satisfy not just technical and design requirements, but also ecological requirements. For example it is important to ensure that where water run-off will impact on an important habitat, the developer is responsible for ensuring that the quality and volume of the water does not alter the balance of the eco-system in question.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/346
Respondent ID	26073857

Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy P14: Regionally Important Geological / Geomorphological Sites
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 14 - Policy P14: Regionally Important Geological / Geomorphological Sites</p> <p>Do you agree with the preferred option to address Regionally Important Geological / Geomorphological Sites in Guildford?</p> <p>Compton PC agrees with Policy P14</p> <p>Do you have any other comments or suggestions?</p> <p>Within the Policy, it would be good to have protection for sites which are not on the Surrey RIGS Group list, but which are of equal Geological /Geomorphological interest/importance as those which have been listed.</p> <p>Point 2 could be strengthened by changing “ <i>every effort is made by the applicant to reduce harm to the conservation interests of the Regionally Important Geological/Geomorphological Site through avoidance and mitigation measures</i>” to “<i>the applicant must reduce harm to the conservation interests of the Regionally Important Geological/ Geomorphological Site through avoidance and mitigation measures.</i>”</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/347
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 15 - Policy D4: Achieving a High Quality Design and Local Distinctiveness</p> <p>Do you agree with the preferred option to address high quality design and local distinctiveness in Guildford?</p> <p>Compton PC agrees with Policy D4.</p> <p>Do you have any other comments or suggestions?</p> <p>1 should include variety of design, particularly on large developments to avoid a repetition of old style housing estates where many houses looked the same.</p> <p>5c Maximum building heights should be established for urban and rural areas. Without a policy specifying building heights, developers will be able to submit applications for tall tower blocks, which change the character of the town centre. Even if these applications are rejected by the Council, they could be pushed through on appeal. There should be no buildings above three stories in the setting of the AONB or in other sensitive areas.</p> <p>5e/f – Reflective materials/colours should be avoided in areas which are overlooked from the AONB.</p>

	<p>5f – Adequate screening should be a requirement for any development overlooked from any part of the AONB.</p> <p>7e – The character of development – ‘new development will be required to respond to the Guildford Town Centre Views SPD’ – could be widened to include views into and out of open countryside.</p> <p>We would like to see vernacular design encouraged in traditional Surrey/village settings and in areas which form the setting to the Surrey Hills AONB and a greater emphasis on energy efficient design</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/348
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Question 16 - Policy D5: Privacy and Amenity

	<p>Do you agree with the preferred option to address privacy and amenity in Guildford?</p> <p>Compton PC agrees with Policy D5.</p> <p>Do you have any other comments or suggestions?</p> <p>Protection of amenity should apply during the building phase as well as after and this must include traffic volume, routes and working times.</p> <p>No further comments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/349
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D6: Shopfront Design and Security
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Question 17 - Policy D6: Shopfront Design</p> <p>Do you agree with the preferred option to address shopfront design in Guildford?</p> <p>Compton PC agrees with Policy D6 regarding shopfront design.</p> <p>Do you have any other comments or suggestions?</p> <p>Compton PC suggests that GBC explores the option for avoiding vibrant colours on the High Street altogether, and instead opting only for neutral tones, which are more in keeping with a historic town centre.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/350
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Question 18 - Policy D7: Advertisements, hanging signs and illumination</p> <p>Do you agree with the preferred option to address advertisements, hanging signs and illumination in Guildford?</p> <p>Compton PC does not agree with Policy D7 (See below).</p> <p>Do you have any other comments or suggestions?</p> <p>Compton PC does not support the introduction of any illuminated or neon shop-fronts or signs in the historic section of the High Street. Policy 2 could be widened to incorporate sight-line issues, rather than just access (as ad-hoc signs on street corners can affect sight lines for drivers).</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/351
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D8: Public Realm
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Question 19 - Policy D7: Public Realm</p> <p>Do you agree with the preferred option to address public realm in Guildford?</p> <p>Compton PC has no objection to Policy D7.</p> <p>Do you have any other comments or suggestions?</p> <p>Change bullet point 9 (public art) “Considered and assessed against the Council's Art Strategy <u>and against public opinion via the use of on-line polling.</u>”</p> <p>Add a policy requiring enhancement of the river frontage (in appearance and usage).</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/352
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

<p>Comment</p>	<p>Question 20 - Policy D9: Residential Intensification</p> <p>Do you agree with the preferred option to address residential intensification in Guildford?</p> <p>Compton PC agrees with Policy D9 (subject to further clarification)</p> <p>Do you have any other comments or suggestions?</p> <p>Point C (“Proposals involving ‘back-land’ development must avoid long, narrow and isolated access points”) is too vague. How “long” and “narrow” must the access points be?</p> <p>Point F Compton PC believes this Policy is too vague and subjective. What are “appropriate infrastructure contributions”? There needs to be some guidance, for example a schedule of infrastructure contributions could be drawn up according to how many houses/facilities are built on a particular site.</p> <p>The accumulative effect would need to be assessed so that adequate facilities / services accompany intensification (along with adequate CIL).</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/353</p>
<p>Respondent ID</p>	<p>26073857</p>
<p>Respondent Name</p>	<p>Compton Parish Council Local Plan Sub-Committee (Karen Stevens)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy D10: Noise Impacts</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Question 21- Policy D10: 'Agent of Change' and Noise Impacts

Do you agree with the preferred option to address the 'Agent of Change' principle and noise impacts in Guildford?

Compton PC agrees with Policy D10.

Do you have any other comments or suggestions?

Lorries and motor bikes are especially noisy as is stop/start traffic. Greater consideration should be given to signage and suggested networks for lorries and motor bikes/motor bike shops where they pass through residential areas. Where possible, average speed cameras would also improve noise from acceleration/breaking as well as improve safety.

No further comments.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/354

Respondent ID

26073857

Respondent Name

Compton Parish Council Local Plan Sub-Committee (Karen Stevens)

Agent Name

Section

Policy D11: The Corridor of The River Wey & Godalming Navigations

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 22 - Policy D11: The Corridor of the River Wey and the Guildford and Godalming Navigation</p> <p>Do you agree with the preferred option to address the corridor of the river Wey and the Guildford and Godalming navigation in Guildford?</p> <p>Compton PC supports Policy D11</p> <p>Do you have any other comments or suggestions?</p> <p>Compton PC would like to see the policy extended to include specific ruling on the prevention of pollution or deterioration of water quality of the River Wey and the Guildford and Godalming Navigation.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/355
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 23 - Policy D12: Sustainable and low impact development</p> <p>Do you agree with the preferred option to address sustainable and low- impact development in Guildford?</p> <p>Compton PC agrees with Policy D12</p> <p>Do you have any other comments or suggestions?</p> <p>The whole-life environmental impact of new and existing buildings should be considered. Where a building is undergoing change of use, for example the Debenhams building, the carbon footprint could be reduced by reusing as much as possible the existing fabric of the building already on the site.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/356
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D13: Climate Change Adaptation

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 24 - Policy D13: Climate Change Adaptation</p> <p>Do you agree with the preferred option to address climate change adaptation in Guildford?</p> <p>Compton PC agrees with Policy D13.</p> <p>Do you have any other comments or suggestions?</p> <p>No further comments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/357
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 25 - Policy D14: Climate Change Mitigation</p> <p>Do you agree with the preferred option to address climate change mitigation in Guildford?</p> <p>Compton PC does not agree with Policy 25.</p> <p>Do you have any other comments or suggestions?</p> <p>Compton PC would prefer to see an interim climate-change mitigation policy introduced, which could be updated in the light of possible amendment to the <i>Planning and Energy Act 2008</i>. To introduce a more stringent carbon-reduction standard that is subject to “viability testing” would give developers the “wriggle room” to simply say that meeting the new standard is not viable.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/358
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 26 - Policy D15: Large-Scale Renewable and Low-Carbon Energy</p> <p>Do you agree with the preferred option to address large-scale renewable and low-carbon energy in Guildford?</p> <p>Compton PC could only support this Policy under the proviso that any land selected for large-scale renewable and low-carbon energy would have zero impact on Areas of Outstanding Natural Beauty (including their settings), Areas of Great Landscape Value and on the openness of the green belt.</p> <p>Do you have any other comments or suggestions?</p> <p>Incorporate within the policy a stipulation that no land selected for large-scale renewable and low-carbon energy will impact the AONB or its setting, AGLV or the openness of the green belt. Place a greater emphasis on energy efficiency in terms of design</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/359
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is	

Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 27 - Policy D16: Designated Heritage Assets</p> <p>Do you agree with the preferred option to address designated heritage assets in Guildford?</p> <p>Compton PC supports Policy D16.</p> <p>Do you have any other comments or suggestions?</p> <p>No further comments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/360
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D17: Listed Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 28 - Policy D17: Listed Buildings</p> <p>Do you agree with the preferred option to address listed buildings in Guildford?</p> <p>Compton PC agrees with Policy D17.</p> <p>Do you have any other comments or suggestions?</p> <p>The Street through Compton has many listed buildings, the integrity of which is affected by traffic vibrations and lorries in particular. Vulnerable buildings as well as the impact of noise should be considered when routing heavy/ noisy traffic</p> <p>No further comments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/362
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D19: Scheduled Monuments
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 30 - Policy D19: Scheduled Monuments & Registered Parks and Gardens</p> <p>Do you agree with the preferred option to address scheduled monuments & registered parks and gardens in Guildford?</p> <p>Compton PC agrees with Policy D19.</p> <p>Do you have any other comments or suggestions?</p> <p>No further comments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/363
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy D20: Non-designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 31 - Policy D20: Non-Designated Heritage Assets</p> <p>Do you agree with the preferred option to address non-designated heritage assets in Guildford?</p> <p>Compton PC agrees with Policy D20.</p> <p>Do you have any other comments or suggestions?</p> <p>No further comments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/364
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Question 32 - Policy ID5: Protecting Open Space</p> <p>Do you agree with the preferred option to address protecting open space in Guildford?</p> <p>Compton PC agrees with Policy ID5</p> <p>Do you have any other comments or suggestions?</p> <p>No further comments</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/365
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy ID6: Open Space in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Question 33 - Policy ID6: Open Space in New Developments</p> <p>Do you agree with the preferred option to address open space in new developments in Guildford?</p> <p>Compton PC agrees with Policy ID6</p> <p>Do you have any other comments or suggestions?</p> <p>Compton PC would like to see more land allocated to allotments. There is a growing trend for families to grow their own food, and lengthy waiting lists for existing allotments across the borough. It is unclear as to how thresholds will be dealt with when land is sold and developed by more than one developer. For example, if developer A builds 49 houses, he/she is not required to implement additional play spaces etc. Then, if developer B also builds 49 houses and is also under the threshold, this could result in a development of almost 100 houses with no 'green infrastructure'. Policies must account for accumulative impact.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/366
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy ID8: Community Facilities
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Question 35 - Policy ID8: Community Facilities</p> <p>Do you agree with the preferred option to address community facilities in Guildford?</p> <p>Compton PC agrees with Policy ID8</p> <p>Do you have any other comments or suggestions?</p> <p>Guildford town centre has many facilities (G Live, theatres, restaurants) which might be more widely supported by the borough's communities if night time public transport were implemented.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/367
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy ID9: Retention of Public Houses
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>Question 36 - Policy ID9: Retention of Public Houses</p> <p>Do you agree with the preferred option to address the retention of public houses in Guildford?</p> <p>Compton PC supports Policy ID9</p> <p>Do you have any other comments or suggestions?</p> <p>Nighttime public transport across the borough would benefit businesses such as public houses</p> <p>No further comments.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/368
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>Question 37 - Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network</p> <p>Do you agree with the preferred option to address achieving a comprehensive Guildford borough cycle network in Guildford?</p> <p>Whilst Compton PC supports a denser cycle network across the borough, the PC has strong reservations about some of the routes presented, for example the proposed greenway to the west of Guildford follows a steep gradient at the northern end and crosses the A31 at a point where visibility is extremely poor to the west, and where frequent road traffic accidents have occurred. Further south, the proposed route passes through a belt of ancient woodland, which would potentially cause harm to this sensitive natural habitat.</p> <p>Whilst modal shift is supported, in reality it is unsafe on busy roads such as the B3000 where several very serious and one fatal accident involving cyclists have happened recently. Cycle lanes should be sufficiently wide and preferably separate from mainstream traffic.</p> <p>Do you have any other comments or suggestions?</p> <p>Remove or reroute the green cycle route to the west of Guildford.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/369
Respondent ID	26073857
Respondent Name	Compton Parish Council Local Plan Sub-Committee (Karen Stevens)
Agent Name	
Section	Policy ID11: Parking Standards

<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is Sound?</p>	
<p>Do you consider this section of the document complies with the Duty to cooperate?</p>	
<p>Comment</p>	<p>Question 38 - Policy ID11: Parking Standards</p> <p>Do you agree with the preferred option to address parking standards in Guildford?</p> <p>Compton PC agrees with the preferred option to address parking standards in Guildford.</p> <p>Do you have any other comments or suggestions?</p> <p>There is no mention within the Policy of underground or multi-story parking provision. In a borough which has a shortage of land available for building, surface car parking should be kept to a minimum. New developments, particularly non-residential developments, should come with a requirement for parking to be underground, or in less visually sensitive areas, multi-story car parks could be built. Compton PC would also like to see building above some of surface car parking across the borough.</p> <p>Use of climate change as a lever for councils and developers to underestimate the level of parking required on the basis of modal shift has happened all too often. When assessing plans, councillors must be realistic about car use today, which has in fact increased since Covid-19 and concerns over use of public transport.</p> <p>New homes often convert garages into offices and other residential spaces resulting in cars being parked on pavements and roads. Careful consideration should be given before consenting to change of use where off street parking is likely to cause obstruction.</p>
<p>What changes do you suggest should be made to the document?</p>	

Files	
Comment ID	LPDM21B/374
Respondent ID	38234753
Respondent Name	CPRE (Alivia Kratke)
Agent Name	
Section	Policy E11: Animal-related Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy E11: Animal-related Development (pages 29-32)</p> <p>We note the policy makes no reference to the need to protect the openness of green belt and areas of the countryside with no consideration given to the adverse impacts of development that is inappropriate to green belt. We suggest that Policy E11 (1) (b) be amended to state: “have no unacceptable impact on the nature conservation or biodiversity value of the site and the quality of pasture”[and no adverse impact on the openness of the Green Belt and countryside].</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/375
Respondent ID	38234753

Respondent Name	CPRE (Alivia Kratke)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P8/P9: Protecting Important Habitats and Species (pages 45-48)</p> <p>Policy P8/P9 (4) (b) requires an “<i>appropriate buffer around the ancient woodland of a minimum of 15 metres or a greater distance if specified by national policy</i>” in line with the buffer zone of at least 15 metres stipulated in Natural England’s and the Forestry Commission ‘Standing Advice’ on Protecting Ancient Woodland. The policy does not mention conditions to be applied to approving drainage schemes. We would ask that in line with the ‘Standing Advice’ just referenced that only sustainable drainage schemes be approved that do not affect root protection areas or result in any change to the water table that negatively affects ancient woodland or ancient and veteran trees.</p> <p>The policy proposal is also silent on conditions to be applied to the building works. We would suggest the policy be supplemented by an additional requirement that steps should be taken to ensure that trees and their roots systems, particularly near the woodland boundary, are not damaged during the building work.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/376

Respondent ID	38234753
Respondent Name	CPRE (Alivia Kratke)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D9: Residential Infill Development (page 103- 106)</p> <p>Para 5.101 references paragraph 71 of the NPPF that states that plans should be set out to resist inappropriate development of residential gardens (the practice known as “garden grabbing”). The protections offered in the current drafting of Policy D9 should be strengthened with further points added to (4) to ensure the proposals for backland development accord with the character of the area and:</p> <ul style="list-style-type: none"> ● do not significantly change the living conditions of neighbouring occupiers (e.g. lack of privacy with neighbours overlooked, block natural light to neighbouring properties, adversely impact the street scene); ● nor result in the removal of trees or impact adversely on protected species (such as newts around points and bats in trees or outbuildings. If these are anticipated then an ecological survey should be required. ● Have appropriate drainage proposals.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/377
Respondent ID	38234753
Respondent Name	CPRE (Alivia Kratke)
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D10a: Light Impacts and Dark Skies (page 114 to 118)</p> <p>Policy D9 (6) as currently drafted states: <i>“In more remote locations of the Surrey Hills AONB, with darker skies, development proposals that cause light pollution will be resisted”</i>. We would like “remote” removed and this line amended to cover any development proposals of any Green Belt land that lies within the Surrey Hills AONB.</p> <p>CPRE has long been a leading voice in the campaign against light pollution. We're concerned that in open areas of Green Belt that should be protected from development, genuine dark starry night skies are becoming harder to find. Light pollution disrupts wildlife and leads to a loss of natural habitat CPRE often in sensitive landscapes. With the national spotlight being shone on the climate emergency and biodiversity crisis it is simply wrong for Guildford council to not strengthen protections from light pollution to all AONB countryside.</p> <p>As we saw with the recent Urnfield, Downside Road application last year (ref 20/P/00825) (not a remote location) the proposals for artificial lighting were progressed to the Planning Committee despite the Council’s own planning team noting that the flood lighting would have an adverse impact on the landscape and visual effect on the Surrey Hills Area of Outstanding Natural Beauty and Green Belt location. The policy should be amended to ensure this could not</p>

	happen again.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/378
Respondent ID	38234753
Respondent Name	CPRE (Alivia Kratke)
Agent Name	
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D15: Renewable and Low Carbon Energy Generation and Storage (pages 137-140)</p> <p>PolicyD15 (2) states that special circumstances may be considered where proposals for renewable and low carbon energy generation (such as wind turbines) are proposed in the Green Belt. This should be altered to state explicitly that proposals will not be considered for Green Belt land that lies within the Surrey Hills AONB.</p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/379
Respondent ID	38234753
Respondent Name	CPRE (Alivia Kratke)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network (pages 213-217)</p> <p>While CPRE Surrey is supportive of the benefits of cycling, the development of cycle networks must not result in the intensification and urbanisation of open countryside. The extent of public opposition to this is evidenced by the resistance seen to the recent Shalford plans to widen, tarmac and install 5 metre high lights for the entire length of Dagley cycle lane to Guildford. The policy should be amended to ensure that “mechanisms for improvements resulting from new development” do not have the potential to harm the character and experience of the AONB and protect the openness of areas of Green Belt.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/408
Respondent ID	8566305
Respondent Name	Deborah Seabrook
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>Greater emphasis needs to be given to long term cycle parking.</p> <p>Perhaps an additional category of ‘long-stay public cycle parking’ is needed to distinguish it from the existing definition for ‘private’ parking.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/409
Respondent ID	8566305
Respondent Name	Deborah Seabrook
Agent Name	

Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>The number of car spaces allowed is so much greater than the minimum required long-stay cycle spaces. That does not encourage modal shift. For example, only one cycle space is required for 200 sqm of office space but a max of 6 car spaces is allowed.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/410
Respondent ID	8566305
Respondent Name	Deborah Seabrook
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	[A response to the draft Parking SPD consultation which covers policy matters] It is accepted that residents of nursing homes are unlikely to ride bikes, but what about staff? 0.05 spaces per bedroom means only 1 space per 20 staff.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/104
Respondent ID	38162625
Respondent Name	Defence Infrastructure Organisation (Stephen Harness)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policies P6/P7 : Biodiversity in New Developments The proposed policy (at paragraph 12) includes a requirement for qualifying development to achieve a biodiversity net

	<p>gain of at least 20%. Whilst the MOD will aim to accord with the provisions in the Environment Act in respect of Biodiversity Net Gain; there is a concern that setting the minimum level at 20% for all qualifying development may have the effect of limiting the scope to make provision for the necessary development on the MOD sites in the Local Plan area and therefore having National Security impacts. In addition, the fact that it does not recognise the considerable amount of work that the MOD has been doing in the area to enhance biodiversity through its stewardship work over the years, introduces a</p> <p>perverse incentive to consider halting such work and therefore will run entirely contrary to the aims of the Local Plan.</p> <p>Further, whilst we note the references in the text to the methodologies and characteristics of areas, there does not appear to be a clear evidence base merely the reference in para 3.47 of the supporting document relating to achievability and costs, and a impact assessment estimating a low confidence level of meeting 10%, instead of demonstrating how the figure of 20% was calculated including taking into account the enhancement work undertaken, and therefore whether it is appropriate in respect of the MOD sites. The approach is therefore questioned, and we seek a clearer evidence base for the approach to be provided before such a blanket policy be adopted.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/261
Respondent ID	38209761
Respondent Name	DP9 (Louise Overton)
Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Review Mechanisms</p> <p>Emerging Policy H7 ‘Review Mechanisms’ is a new policy which has been introduced to the Regulation 19 DMP 2022. This policy seeks to review the viability of a scheme with the aim of achieving policy compliance over time.</p> <p>Part 4 of the policy states that in the case of a late stage review, the contribution will be a payment in lieu unless otherwise agreed. The draft wording proposes that a late stage review is to be undertaken prior to the sale or lease of 75% of market homes “<i>or at an agreed similar point</i>”. Should a surplus be identified, it is proposed that this will be delivered as a payment in lieu rather than as on-site units.</p> <p>Our client recognises the importance of delivering affordable housing on sites and recognises that the submission of viability assessments can help identify what can / cannot be delivered by a scheme at the time of submission. Our client also recognises that viability review mechanisms are being introduced more regularly and the approach of Guildford to securing any identified surplus to be delivered as a payment in lieu is pragmatic. However, it is important that any requirement for a review mechanism should not result in uncertainty or adverse risk on the future deliverability of a site which could undermine the deliverability of a site as whole. It is therefore recommended that further detail and guidance is provided within the policy itself or supporting text to provide additional clarity and certainty.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/258
Respondent ID	38209761

Respondent Name	DP9 (Louise Overton)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Housing Density</p> <p>Emerging Policy H4 ‘Housing Density’ of the Regulation 18 version of the DMP (June 2020), sought to provide two different options regarding the approach to housing density; to rely upon relevant policies in the NPPF, Planning Practice Guidance and relevant policies in the Local Plan strategy and sites (2019) and therefore not have a specific policy, or to set a minimum density range for different areas within the Borough.</p> <p>In response to one of the consultee comments received during the Regulation 18 version of the DMP which states that a prescribed approach to density must be provided within policy, we note the Council’s response which states the following:</p> <p>“It is not considered appropriate to translate the dwelling numbers for the LPSS into a policy. Each planning application must be considered on its own merits, which includes consideration on the height of buildings and dph. New residential development must be guided by good design principles and not by set dph figures. Often, when a maximum figure is set that becomes the guiding factor, at the expense of design. An appropriate site density should result from a design-led approach, rather than a predetermined density or mathematical calculation.”</p>

Our client supports this approach and we note that Emerging Policy H4 has subsequently been deleted from the Regulation 19 DMP 2022. Density is now proposed to be captured within Emerging Policy D4 ‘Achieving High Quality Design and Respecting Local Distinctiveness’ with this stating that development proposals are required to “reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including the size of the site, characteristics and location, local context and urban grain of the area”, as well as being expected to make “efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area’s prevailing character and setting.”

Our client is supportive of this approach in principle, recognising that the built form and character of Guildford varies significantly across the borough. However, in town centre locations such as the Debenhams site - which we know is a site of strategic importance to the borough – we believe further flexibility on the approach to density should be applied, particularly when a site is located in a highly accessible location which offers the opportunity to deliver an increased number of homes.

Achieving High Quality Design and Respecting Local Distinctiveness

Emerging Policy D4 requires development to incorporate high quality design which should contribute to the local distinctiveness by demonstrating a clear understanding of the place, as well as responding positively to the history of a place and that it must recognise and respond to significant views.

Our client supports the principle of the policy and recognises the importance of delivering high quality design. This is demonstrated in the schemes they have delivered across the country.

Our client also welcomes the recognition provided in supporting paragraphs 5.11 and 5.12 that when considering the characteristic of a site and local distinctiveness, a high quality development “does not necessarily mean replicating what is already there.”

	<p>Building Heights</p> <p>From a review of the responses provided to the Regulation 18 DMP consultation, we note that there were requests for the DMP to cover and be prescriptive on building heights, particularly maximum building heights.</p> <p>Emerging Policy D4 – or any of the emerging policies – do not propose either a minimum or maximum building height. From a review of the Council’s responses to the comments received during the Regulation 18 consultation period, it is stated that “it is not possible to set a definitive height restriction as it will vary considerable even across a relatively small area as it will be informed by the surrounding buildings, topography, views etc.”</p> <p>This is supported by our client as a restrictive approach to height has the potential to undermine the deliverability of the Plan’s growth objectives and limit opportunities to deliver high quality buildings when balanced against other requirements of the Plan.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/260</p>
<p>Respondent ID</p>	<p>38209761</p>
<p>Respondent Name</p>	<p>DP9 (Louise Overton)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy D11: The Corridor of The River Wey & Godalming Navigations</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

River Wey and Godalming Navigations

Emerging Policy D11 ‘The Corridor of the River Wey and Godalming Navigations’ requires developments to conserve and enhance the character, establish a positive relationship with the setting and waterfront character, as well as integrate flood risk mitigation measures. In addition, it states that development proposals are expected to improve visual and physical public access to and along the river by providing “*direct, safe and clear public access to and along the river*”.

Our client supports the aspirations of the policy and recognises the importance for those sites which adjoin the river to enhance access. However, any proposed improvements need to be considered against the existing context and each site should be considered on a case by case basis.

We therefore believe that the policy wording should be amended to:

*“Development proposals adjoining the river are expected **where possible** to seek to improve visual and physical public access to and along the river by...”*

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/120

Respondent ID

8563265

Respondent Name

Effingham Parish Council (Parish Clerk)

Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>1. Policy H7: Review Mechanisms</p> <p>The Council want to ensure policy compliant development, which maximises public benefits in line with the policies of the Local Plan. However, the policy states that, “where proposals are being considered that at the outset may not meet Local Plan affordable housing requirements, the Council will seek a review of viability of the scheme with the aim of achieving policy compliance over time...If a reduced contribution to affordable housing than that which is required by the Local Plan is proposed and justified on viability grounds, the Council will, where it considers appropriate, require a viability review mechanism to be secured.”</p> <p>EPC is concerned that this provision is open to abuse by developers: financial viability assessments require complex financial modelling expertise and contain very detailed information, most councils lack in-house capacity. Developers play the system and frequently try to renegotiate when a development looks like it may underperform, impacting its viability after agreement on affordable housing requirements has been finalised. If a scheme cannot or may not meet affordable housing requirements at the outset, it should not be approved.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/123

Respondent ID	8563265
Respondent Name	Effingham Parish Council (Parish Clerk)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>4. Policy P8/P9: Protecting Important Habitats and Species</p> <p>We support the proposals to identify and map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them.</p> <p>In this context EPC would have liked to have seen the wildlife corridors and stepping stones that are detailed in the Effingham neighbourhood plan mentioned in the proposals. The wildlife corridors and stepping stones designated in the ENP are already coming under pressure from developers including with the development of the new Howard of Effingham school at Effingham Lodge Farm. The developer in this case whilst recognising the importance of wildlife corridors will, in effect, block an important wildlife corridor with the development of the new school. EPC suggests that there should be enhanced wording in the proposals to warn developers that the blocking of wildlife corridors and the encroachment of developments into stepping stones and ancient woodland will not be allowed without evidence of very special circumstances.</p> <p>There are several pieces of land owned by GBC In Effingham including Home Farm and Effingham Common. When appropriate at Home Farm, we would like to see the latest agricultural rules applied in as much as the installation of nature stewardship strips around the GBC areas and the reduction in hedge cutting to allow for more bird cover. We</p>

	<p>realise that it may depend on the tenancy agreement at the time and the fact that not all the land farmed by the tenant is in GBC ownership, although it is farmed as one. Encouragement from GBC on their land would encourage the tenant farmer to do the same on the non-GBC land. This may depend on the tenancy renewal but maybe also encouraged by discussions with the tenant.</p> <p>Part of Effingham Common adjacent to Effingham Common Road and the cricket square, is not used by agriculture but only for the taking of rough hay. The opposite side of Effingham Common Road is a scrub area leading on to Bookham Common, to an area where Nightingales are said to be present, as it is with this common area. Allowing the rough hay area to re-wild would encourage the nightingales and other wildlife to re-establish and create a wildlife corridor and stepping stone to Hook Common and beyond. The footpaths would remain.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/124
Respondent ID	8563265
Respondent Name	Effingham Parish Council (Parish Clerk)
Agent Name	
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>5. Policy D13: Climate Change Adaptation</p> <p>The document makes no comment on the use of cars which collectively are the most significant emitters of all. In Effingham, we want to create cycle paths to promote healthy lifestyles and reduce reliance on cars, for instance a cycleway from the village to the station along Effingham Common Road. We consider that GBC needs to do far more in this area and that its proposed policy document pays inadequate attention to this important area.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/122
Respondent ID	8563265
Respondent Name	Effingham Parish Council (Parish Clerk)
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>3. Policy ID5: Protecting Open Space</p> <p>We welcome the statement that neighbourhood plans which are successfully adopted will form part of the statutory</p>

	<p>development plan for the area that they cover.</p> <p>We further note that the Effingham and Puttenham Neighbourhood Plans contain policies covering biodiversity and green infrastructure that support biodiversity improvements and improve the linkages between habitats at the neighbourhood level in much the same way as Policy ID6 does at the strategic level in relation to its expectation for new open space to be linked to existing open space as far as possible.</p> <p>EPC is concerned that bullet point 2.14 identifies Local Green Spaces in other parishes but is silent on the six Local Green Spaces designated in the Effingham Neighbourhood Plan (ENP). Therefore, we wish to be consulted before any designation changes are considered for the ENP by GBC.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/121
Respondent ID	8563265
Respondent Name	Effingham Parish Council (Parish Clerk)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment

2. Policy ID11: Parking Standards

EPC welcomes the re-classification of Effingham parish (Guildford 003E) as a rural village and dispersed village and rural area. We also support the initiative for electric vehicle charge points. Our climate group has undertaken research on the location of charge points in the parish and can assist with prospective locations. The exercise has been more complicated than we anticipated due the lack of convenient locations for charge points in the parish.

We also welcome the fact that the parking standards adopted in neighbourhood plans will take precedence over standards set in the local plan. However, given the continued and growing pressures on parking spaces in Effingham, we wish to make the following points.

Parking standards in ENP-R1 reflect the limited parking availability in Effingham and this is especially the case now that there is planning permission granted for over 300 extra houses in the village on Effingham Lodge. It is critical that new developments are able to meet their own parking requirements.

In addition, there is a limited bus service, train services are available 1.7 miles away at either Bookham or Effingham Junction stations; there are no safe off-road cycle routes to the stations and residents are largely reliant upon private cars to commute to work, for shopping and other public services. In short, the developments proposed and new planning applications must have adequate parking provision. On street parking is not an alternative and developers should not rely on it. In particular, we refer you to:

Effingham Neighbourhood Plan Policy ENP-R1: Car Parking

All new developments within the Effingham plan area must provide parking within the site boundary, or nearby, off the public highway, to meet the expected demand of the development, without requiring the use of public roads as overflow parking. The following minimum parking standards shall apply to all residential developments, including affordable housing:

- *studio apartments and one-bedroom units 1 allocated car parking space*
- *two-bedroom unit 2 allocated car parking spaces*
- *three-bedroom unit 2 allocated car parking spaces*
- *four or more-bedroom houses 3 allocated car parking spaces*
- *elderly (sheltered) housing 1 car parking spaces per unit*

	<p><i>Appropriate additional provision in all new developments must be made for visitors (including disabled visitors) and delivery vehicles to park safely off-road for the duration of their visit.</i></p> <p><i>Proposals for public parking provision will be supported which:</i></p> <ul style="list-style-type: none"> <i>• improve car parking to support key village services including stations and shops</i> <i>• preserve and improve existing car parking provision to serve local residents</i> <p><i>It is considered that elderly (sheltered) housing units and those designed for disabled residents should each have their own car parking space to allow for visitors or carers, even though the level of car ownership is likely to be lower than for other housing, since poor public transport in Effingham means visitors and carers would need to use cars.</i></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/380
Respondent ID	15689953
Respondent Name	Environment Agency (Thames Area)
Agent Name	
Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Policies we support We particularly agree with the changes made to and justifications provided to support Policies P12 and D11 and we support these policies.</p> <p>Soundness In respect to issues within our remit we consider the Proposed Submission Local Plan: Development Management Policies (2022) to be sound.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/381
Respondent ID	15689953
Respondent Name	Environment Agency (Thames Area)
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policies we support We particularly agree with the changes made to and justifications provided to support Policies P12 and D11 and we</p>

	<p>support these policies.</p> <p>Soundness In respect to issues within our remit we consider the Proposed Submission Local Plan: Development Management Policies (2022) to be sound.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/67
Respondent ID	8893697
Respondent Name	Gill Woolfson
Agent Name	
Section	Introductory sections
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>I am responding on behalf of Friends of Normandy Wildlife. Our comments relate to the HRA. We would like to thank GBC for producing such a clear document. We are pleased to see the emphasis on Biodiversity.</p> <p>We note that Guildford is considered to be the most diverse area in Surrey in terms of biodiversity. We encourage</p>

	GBC to build on that strength and increase it further
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/73
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	No
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt Group are concerned that this policy is restricting sensible extensions and alterations within Greenbelt areas whereby residents are penalised for trying to expand their family homes. We are obviously staunch supporters of protecting our Greenbelt, but increasingly we are having to call applications into Planning Committee for consideration because of issues with proportion. Small homes are particularly disadvantaged.</p> <p>The very opposite issue is experienced where homes are no longer in the Greenbelt and we are witnessing huge, uncontrolled extensions and knock downs coming forward that are completely out of character with their surrounding street scenes and landscape settings.</p>

	<p>We need to find a way to resolve this and it might be reasonable to refer to 1968 as the original build as some Councils do this.</p>
What changes do you suggest should be made to the document?	<p>For homes in the Greenbelt take the starting date as 1968.</p> <p>Put in guidance on what would be regarded as a sensible increase for homes in the Greenbelt.</p> <p>For those out of the Greenbelt, we should not lose the argument of the date of the original dwelling as we need to control the escalation of applications that propose unreasonable sized extensions.</p> <p>Some measures to prevent the crafty submission of applications that are virtually remodelling the whole house and then when they get permission, suddenly realise it would be cheaper to do a knockdown and re-build - on a bigger footprint, would be helpful, for both Officers and Councillors.</p>
Files	
Comment ID	LPDM21B/74
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Guildford Greenbelt Group have a couple of suggestions to the policy as indicated below.</p>
What changes do you suggest should be made to the document?	<p>This policy needs to emphasise that this is for existing homes, as opposed so new homes - there is a statement included, but this would benefit from being highlighted in bold.</p> <p>Add to point b in the policy impact on street scene as it is not just character.</p> <p>Within the policy it would be helpful to add that there should not be an unacceptable impact on the amenity of neighbouring residents in terms of privacy and access to sunlight and daylight (point expanded to match the same point in H5).</p>
Files	
Comment ID	LPDM21B/75
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt group welcome the requirement to deliver 20% - this is ambitious, and very necessary in a Borough that is suffering from severe biodiversity decimation and decline.</p>

	<p>We have suggested some additions to the policy below.</p> <p>The Policy at point 12 needs emphasis (in bold) applied to the 'whichever is greater' statement, and clarity provided on the national biodiversity net gain calculation methodology as elsewhere we refer to the Defra Biodiversity Metric.</p> <p>It would be helpful to explain what is a 'habitat bank'.</p>
What changes do you suggest should be made to the document?	<p>Correction to 4.49 where it says the policy required the longer period to apply is a typo and should say requires, not required.</p> <p>Monitoring Indicators - gives 25 houses or greater, but this should be 10 and above as this is the standard GBC definition of major development.</p> <p>The policy needs some measure of control when a number of windfall developments come forward in the same locality/village whereby there are 4/5 houses to be built. If there is no control collectively, as is the case in West Horsley and Send, developers are going under the radar for providing any mitigation for the loss of biodiversity. This must be addressed through this policy.</p>
Files	
Comment ID	LPDM21B/76
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

<p>Do you consider this section of the document complies with the Duty to cooperate?</p>	
<p>Comment</p>	<p>Guildford Greenbelt Group welcome the strengthening of some of the wording in this Policy, especially with regard to hedgerows which are so important to the movement of our wildlife, providing crucial wildlife corridors.</p> <p>However, we have significant concerns with regard to the buffer protection zone of 15m for Ancient Woodland. According to the Woodland Trust there is only 2.5% of this rich diverse habitat now covering the UK. Much of what is left is being damaged, yet it cannot be replaced.</p> <p>Policy Point 4b) pg. 44 states that "An appropriate buffer around Ancient Woodland of a minimum of 15m or a greater distance if specified by national policy". This is guided by Natural England however, they are severally understaffed, at best supplying a desk stop study for planning applications, and at worst, just referring the applicant to standard guidance on their website. This is unacceptable, and negligent given that they are a statutory body meant to be protecting and preserving our natural environment.</p> <p>GGG has made contact with NE, and they indicated clearly (we can provide proof of email exchange of views if needed) that they would be in support of LA's who challenge and set greater buffer zones where deemed necessary.</p> <p>We believe that GBC should push for a 20m buffer zone, and that they would have the backing of NE. This would give a clear indication nationally that we are in the business of protecting our environment - especially as this is now one of Corporate Priorities.</p>
<p>What changes do you suggest should be made to the document?</p>	<p>Increase the buffer zone to 20m.</p> <p>Exclude Ancient Woodland from SANG calculations. Developers must find alternative land for SANG to prevent public access whether permitted or not.</p> <p>Correction required - the Monitoring Indicator doesn't make sense. It looks as if the end of the sentence is missing and should include a statement to make is clear that there is no loss of this type of habitat.</p>
<p>Files</p>	

Comment ID	LPDM21B/77
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt Group believe that GBC needs Design Codes in place to support this policy, to address issues of density, character and height.</p> <p>It has been stated that design codes will be used on Strategic Sites via the SPD, but these are also needed on allocated sites whose density and intensification (linked to D9) are way beyond that which is acceptable locally.</p> <p>The reference to controlling piecemeal development is welcomed, but GBC needs to be tough on this to ensure sites are brought forward together and master planned accordingly. You only have to look at the mess in West Horsley for Site A36 to see this disaster in action. Similar situations have been allowed in Send, and likely in other parts of the Borough.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/78

Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	No
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt Group believe that the previous title of this Policy for Reg 18 better reflected the current and likely future situation of a mixture of types of development that are negatively impacting our Borough. It is not just about infilling, but also windfall development, which is happening at a greater pace than intended, 'garden grabbing' etc.</p> <p>We believe that there should be a more specific policy on back garden/green field development, if it cannot be accommodated within this policy. This impacts both urban and rural settings, and has a detrimental effect on our natural environment and the movement of wildlife.</p> <p>GGG recommends that the prevention of inappropriate sub-division of existing curtilages to a size below that in the prevailing area is resisted. This will help preserve existing mature landscapes.</p> <p>The policy also needs to cover protection of existing street scenes or prevailing layout of streets in the local area, including frontage width, building orientation, visual separation between buildings and distances from the road.</p>
What changes do you suggest should be made to the document?	GGG recommend an addition to Policy D9 point 1b) respond positively to the existing character, and landscape setting, and identity of the local area.

	<p>Include a point e) opportunities for the preservation, enhancement, or creation of green and blue infrastructure connections should be maximised, e.g., retention/creation of wildlife corridors.</p> <p>Frontage development needs to ensure that it refers to protecting the existing street scene within the policy.</p>
Files	
Comment ID	LPDM21B/79
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt Group are pleased to see that planning applications now include Climate Impact Reports and recognise that planning officers are working hard to ensure applicants/developers are being held to account in this regard.</p> <p>Point 1 of this policy refers to Fabric First and it would be useful if applicants/developers were required to indicate how they propose to work towards zero carbon.</p> <p>The policy, or certainly the justification, should make reference to the need to use natural building materials where possible in recognition of the need to reduce 'life time' waste of developments.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/80
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt Group recommend that stronger emphasis is given to the types of landscape and roof schemes that help to reduce surface water flooding. We need to look at any opportunity to slow down and absorb increased rainfall through the requirement to include green roofs in building design e.g., on garages. This would all help towards the natural cooling of buildings.</p> <p>There is too much reliance by developers to deliver attenuation ponds which are at the bottom end of the SuDS hierarchy and achieve no environmental benefit.</p> <p>Our homes must be 'future proofed' and GBC must be encouraging more innovative and climate friendly designs, without relying on whether or not the scheme is 'viable'.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/81
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt Group request that within the policy it states that standards may be raised in line with future changes and demands from national policy and building regulations - so whichever is the higher figure. GBC has done this for Biodiversity net gain and MUST do this for Climate Change as both are critical to the preservation of our life and our environment.</p> <p>As there is growing recognition that the targets of net zero, zero carbon, or whatever you want to call it may not be achieved in time, Government policy is likely (hopefully) to have to respond quicker, so GBC must future proof their policies.</p> <p>The policy should be encouraging applicants/developers to put forward the most sustainable technical solutions and infrastructure that will lower carbon emissions.</p>
What changes do you suggest should be made	GGG would like to see the % reduction for carbon emissions increased from 31% to 40% which we believe will force

to the document?	<p>developers to make changes. Somebody has got to be brave and make a start with this as the construction industry is one of the biggest emitters of carbon.</p> <p>At 5.243 it would help to put the statement 'the carbon emission standard applies to each new building individually'.</p>
Files	
Comment ID	LPDM21B/96
Respondent ID	15583841
Respondent Name	Guildford Greenbelt Group (Mrs Catherine Young)
Agent Name	
Section	Appendices C and D
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	No
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Guildford Greenbelt Group believe that P11 Air Quality and Air Quality Management Ares should be upgraded to a strategic policy as it is so critical to the health and well-being of our residents. We are also facing extremely high levels in Guildford of air pollution, with the A3 being identified as one of the worst polluted roads in the UK.</p> <p>There is a typo in E11 as listed. It still refers to it as Equine-related development, and needs to be changed to Animal Related Development.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/311
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H5: Housing Extensions and Alterations including Annexes</p> <p>After H5 1c) add:</p> <p>H5 1d) provide sufficient space between any neighbouring properties and set back from the frontage to enable green planting within the curtilage of the property and along the frontage consistent with the green character of Guildford.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/312
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	

Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H6: Housing Conversion and Sub-division</p> <p>This policy is insufficient for a university town. More emphasis should be placed on cumulative effects and limits should be set for the proportion of HMOs in some areas.</p> <p>After H6 1c) add:</p> <p>H6 1d) vulnerability to flooding of occupants would not be increased.</p> <p>Reasoned Justification 2.26 insert:</p> <p>“Providing sufficient well sited <i>and landscaped</i> parking is an important consideration...”</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/313
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	

Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P6/P7: Biodiversity in New Developments</p> <p>General principles</p> <p>1) Development proposals, including those exempt from minimum biodiversity net gain standards, are required <i>to seek</i> maximum biodiversity gain and to follow the mitigation hierarchy.</p> <p>To <i>seek</i> is too weak. Developments should <i>deliver</i>.</p> <p>Monitoring Indicator: Gains in biodiversity provided by development on sites of 25 homes or greater</p> <p>The threshold of 25 homes or greater for this policy is too high to be effective in addressing the issues identified in the introduction to chapter 4. Effectiveness relies on an indicator that monitors the proportion of all development contributing to biodiversity.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/314
Respondent ID	8556385

Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy P10: Land Affected by Contamination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P10: Land Affected by Contamination</p> <p>Introduction</p> <p>This should refer to the significance of water in dispersing contaminants disturbed by construction in some parts of the borough.</p> <p>Para 2a) insert:</p> <ol style="list-style-type: none"> the appropriate sustainable remediation measures, <i>including monitoring</i>, that will be implemented in order to prevent and/or avoid significant harm to sensitive receptors <p>Monitoring provides an essential assurance link between a remediation strategy and verification reporting.</p> <p>Monitoring Indicator:</p> <p>This should be linked to an environmental outcome relevant to all contaminated sites not to a measure that would discourage consideration of contamination by an inspector in those cases that go to inquiry or appeal.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/315
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy P11: Air Quality and Air Quality Management Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P11: Air Quality and Air Quality Management Areas</p> <p>The way this policy is drafted would not prevent a number of developments, that may not be considered ‘major’, cumulatively causing the air quality in an area to deteriorate to an unacceptable level. For example, if a number of buildings along a busy but relatively narrow road are redeveloped closer to the kerb, are made taller or have canopy features added, this can have a big effect on air circulation and hence nitrous oxide and particulate pollution at street level.</p> <p>The cumulative effects part of Policy 3a) should be redrafted so this relates to <i>all development</i> that would contribute adversely through its height, layout and design, in combination with other development, to pollution levels.</p> <p>Monitoring Indicator</p>

	This should be linked to an environmental outcome not to a measure that would discourage consideration of air quality by an inspector in those cases that go to inquiry or appeal.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/316
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P12: Water Quality, Waterbodies and Riparian Corridors</p> <p>In para 5) insert:</p> <p>5) ...and a Landscape and Ecological Management Plan detailing how <i>its value, including for amenity</i>, will be enhanced in the long-term. For ordinary watercourses, an appropriate buffer is expected that is sufficient to protect and enhance the biodiversity, <i>landscape</i> and amenity value of the watercourse.</p>

	<p>The reference to landscape and ecology along <i>main rivers</i> is welcome. Amenity should also be mentioned being of particular importance along a main river. This should be linked to a green buffer policy as proposed and an ambition to enhance amenity access along the Wey.</p> <p>The reference to biodiversity and amenity along <i>ordinary watercourses</i> is welcome. Landscape should also be a consideration along ordinary water courses given the significance of soft green edges to development for the character of Guildford.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/317
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy P13: Sustainable Surface Water Management

	<p>The timing of SuDS design, as set out in para 4.185, is of paramount importance. There should be a requirement within P13 to demonstrate early consideration of drainage in the design and layout of any proposal.</p> <p>4.185 SuDS need to be considered early in the design process to ensure that they are effective, work with the existing landform, integrate into the development and deliver of multi-functional benefits such as open space, biodiversity and visual amenity whilst ensuring land is used efficiently. Development proposals are required to demonstrate in their Design and Access Statement (DAS) and Flood Risk Assessment (FRA) that drainage has been addressed at an early stage of the design and preparation of the proposal, and that the work aligns with the discharge and SuDS sustainability hierarchies</p> <p>Monitoring Indicator</p> <p>Suggest this is linked to a desired feature of all SuDS, such as proportion of schemes with long term SuDS management plans, rather than focusing on the exceptional situation of an appeal or inquiry recording an inadequate SuDS scheme as a reason for refusal.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/318
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

D4: Achieving High Quality Design and Respecting Local Distinctiveness

This policy urges avoiding development that looks as if it could be anywhere. Yet the policy completely fails to capture the valued characteristics that make Guildford a distinctive green place. It is a could be anywhere policy. There is nothing to guide developers or to prevent them from imposing a template conceived elsewhere of dominant landmark buildings on corners and tall buildings along routes. Soft green edges to settlements, greenery along frontages, riverbanks and roads, and space for mature trees are valued distinctive traits which, if not captured, will be lost. They will be important in guiding new development. The Council’s “greening the approaches” ambition should be referred to.

The references to density are inadequate to guide what will be appropriate and prevent the application process being dominated by wrangles over how much an excessive scheme needs to be reduced in size before it is no longer “detrimental”. Without a clear density framework, any schemes that are approved due to exceptional circumstances, such as Solum which was assessed in the absence of an approved plan or 5-year supply, will be used as benchmarks rather than as exceptions. The tallest scheme along the river will set the bar for the height and density of riverside development rather than a policy expectation that is based on the character of the Wey corridor.

The DMP Policies do not adequately address the following important valued characteristics of Guildford that also contribute to making it distinctive:

Height – impact on views, townscape, landscape & environment incl context of narrow roads

- *Criteria driven policy with clear expectations and limits*
- *Solum not a precedent – era when no housing supply in a Plan*

Bulk and massing – in relation to distinctive downland landscape setting

Rise and fall of land - reflected in form of built environment

	<ul style="list-style-type: none"> • <i>views, distinctive, eg North Street, if tall buildings at bottom of slopes create rood top plateau and disguise landform</i> <p>Green character – including space for mature planting within plots, effective screening to achieve soft green edges to settlements, green corridors along routes into settlements</p> <p>Density - footprint allows space between buildings consistent with valued characteristics of town centre, garden suburbs and villages, including space for greenery</p> <p>Views - importance of views in and out</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/319
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D6: Shopfront Design and Security
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment

Policy D6: Shopfront Design and Security

The retention of architectural details and features of interest contributes positively to the character and appearance of Guildford.

In para 2) insert:

2) All new and alterations to shopfronts are expected to use high quality sustainable materials and to be of a design ***and colour*** that retains, or relates well to the proportion, scale, detailing, period and character of the host building as a whole, as well as the wider street scene.

Paragraph 4) is particularly welcome representing an approach that underpins the continuing character and vitality of Guildford's retail areas.

4) Original features and details, including but not limited to fascias, pilasters, transoms, mullions and stall-risers, are expected to be retained where they are of architectural or historic interest, or where they contribute positively to the character and appearance of the street scene or area.

The explanatory text should be clear that perspex and similar fascia strips that obscure the architectural features or have a negative impact on the proportions of a building will be resisted.

Care should be taken to ensure this policy also relates well to modern purpose-built retail units, including for example along Ladymead, and ensures high level as well as overly deep fascia strips can be avoided. 5.49 should read "Oversized fascias which extend **or are positioned** above the ground floor or obscure architectural features of value will not be supported..."

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/320

Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D7: Advertisements, Hanging Signs and Illumination</p> <p>In para 1) insert:</p> <p>1) Development proposals for advertisement and signage are required to demonstrate that there is no harm to amenity, <i>character</i> or public safety by reason of:</p> <p>The explanatory text should refer to size limits for projecting signs in some locations, to avoiding obtrusive use of moving images or totems, to use of vinyl infilling of windows or, as on the Friary, to banners stuck onto architectural features of buildings.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/321
Respondent ID	8556385

Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D8: Public Realm
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D8: Public Realm</p> <p>2) High quality new or improved public realm proposals are required to demonstrate that:</p> <p>An additional bullet point under 2) should be a requirement to demonstrate that <i><u>such proposals are of a scale and gradient consistent with the proposed use and with ease of access in the vicinity of buildings with raised thresholds.</u></i></p> <p>Public realm design should provide adequate space around buildings with raised thresholds. Raised thresholds are a common feature linked to flood risk management and where there are changes in ground level across the frontage of buildings. In these circumstances it is necessary to provide sufficient space both for smooth access to the relevant buildings and, also, for ease of circulation and beneficial use of amenity space in the vicinity. In these circumstances, design of public realm should be an early consideration and be assessed before building footprint is determined. Public realm that slopes away from buildings or undulates cause issues for many users including those using wheelchairs or pushchairs. Benches on awkward slopes have less amenity value. An example of a pavement that is too narrow and has too many awkward changes of level to be functional for many users is along the access road to Boxgrove Gardens. The casino application is an example of a proposal that failed to address ground levels in relation to thresholds, safe entrances and functional public realm for users of the development and passers-by.</p> <p>3) Proposals for public spaces are expected to consider the opportunity to provide:</p>

	An additional bullet point under 3) should be to consider the opportunity to provide a positive contribution to sustainable urban drainage.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/322
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D9: Residential Infill Development Proposals</p> <p>In para 1 insert:</p> <p>1) Residential infill development proposals, <i>including any associated access or parking</i>, are required to:</p> <p>It is important that impact of any new access and of any new parking is clearly established as a notable consideration</p>

in relation to infill development. This would be consistent with 5.100

In para 1b) insert:

1. b) respond positively to the existing character, spacing and identity of the local area;

Spacing between buildings is a trait requiring specific reference to ensure it is not overlooked as a consideration. Such a reference is not prescriptive. It requires that the new spacing responds positively including allowing space for landscaping between buildings where appropriate.

In para 1d) insert:

1. d) incorporate landscaping measures and ensure that sufficient amenity space, parking, bin storage and cycle parking are available and that they relate well to the buildings within the site and within neighbouring properties.

The explanatory text should be explicit that appropriate landscaping will be required **within** the site and that reliance cannot be placed on landscaping features in an adjoining property.

Para 5.99 should be expanded to refer explicitly to avoiding infill that creates a terraced effect, resulting in a wall of development in an area where spacing between properties or groups of properties, often with some landscaping between, is a notable feature of the character.

Para 5.101 is welcome. Suggest reference is also made here to the impact on neighbouring properties of access. **Differences in ground levels** should be added to the list of factors that can result in unacceptable impacts on amenity and privacy, alongside proximity, orientation and height of new development

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/323

Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D10: Noise Impacts
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D10: Noise Impacts</p> <p>The introduction should refer to the increase in residential use of town centres making effective management of noise from clubs and pubs, including from outdoor smoking areas, more important.</p> <p>It should be explicit and clear that this policy will ensure noise from school play areas and pitches (including all weather surfaces) will be considered and managed appropriately where this would have an impact on adjoining residential areas. It should no longer be possible to permit development which means residents cannot sleep or work with their windows open in summer. Adequate landscaping within application sites and other mitigation should be required and should take account of relative land levels.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/324
Respondent ID	8556385

Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D10a: Light Impacts and Dark Skies</p> <p>In para 1) insert:</p> <p>1) ... Consideration must be given to potential adverse impacts on privacy, amenity, <u>views</u> and the natural environment, including wildlife, sensitive habitats, and sites designated for their nature conservation value.</p> <p>In para 2) insert:</p> <p>2) ... Light Impact Assessments are required to clearly detail any potential significant adverse impacts, <u>including cumulative effects</u>, that artificial lighting may have on privacy, amenity, and the natural environment, including wildlife, sensitive habitats and sites designated for their nature conservation value</p> <p>The effect on the amenity of residents of additional lighting proposals at schools or sports facilities is a growing issue.</p> <p>Para 4 is welcome. 4) Proposals for light-generating development are required to prevent and/or avoid unacceptable light spillage into natural terrestrial and aquatic habitats, or their buffer zones.</p> <p>The reference in paragraph 5.166 that “River channels and waterbodies with their wider corridors should be</p>

	considered Intrinsicly Dark Areas” is also welcome. However, the proposed use of directional and focused lighting would be insufficient to achieve this. The policy and reasoning should advise that, where possible, the layout of a development should avoid placing features that require lighting, such as roads, close to a watercourse.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/325
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D11: The Corridor of The River Wey and Godalming Navigations</p> <p>1) Development proposals which impact The River Wey and Godalming Navigations and its environs are required to:</p> <p>An additional requirement under 1) should be to:</p>

#) Be set back sufficiently to avoid intrusion into the landscape setting or functioning of the river and of a scale that avoids overshadowing the river or an overbearing impact on riverside amenity.

Proposed bullet point 1c) needs amending to avoid being applied and causing harm in more rural parts of the Wey Corridor or near areas of high nature conservation importance such as the stretch by Weyside Urban Village.

We suggest amending as follows:

c) establish a positive relationship with the Navigations' setting and waterfront character and its historic **and ecological** interest, ~~taking full advantage of its location~~, addressing the waterway as a

frontage and opening up views in the town centre, **and enhancing the green buffer between the river and development outside the town centre;**

Opening up views of the river environment at Weyside Urban Village, in the vicinity of Riverside Park, would be a retrograde and damaging step and at odds with other policies in this Plan. At Weyside the policy objective should be for residents to be able to enjoy access to the river corridor through a buffer of trees, rather than for buildings to be seen from, and thereby destroy, the riverside environment.

In para 2) insert:

2) Development proposals adjoining the river are expected to seek to improve visual and physical public access to and along the river **and the green character of the river corridor** by:

1. a) providing direct, safe and clear public access to and along the river;
2. b) providing a 'joined-up' approach to river access, considering access and uses up and down stream, as well as across the river channel and the adjoining areas to the existing towpath;

#) enhancing the ecological potential along each bank of the river with native landscape features; and

1. c) enabling and supporting the promotion of active and healthier lifestyles.

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/326
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D12: Sustainable and Low Impact Development</p> <p>In the para on embodied carbon, para 2, insert:</p> <p>2) Development proposals are required to demonstrate that embodied carbon emissions have been minimised by: ...</p> <p>b) taking into account the embodied carbon emissions of materials based on information provided in a respected materials rating database, <i>including where relevant the option of adaptation of an existing building with its embodied carbon.</i></p> <p>The introduction makes welcome reference to the desirability of buildings being designed to have a long useful life. This is of such importance for sustainable development and reducing carbon emissions that para 3) should be</p>

	<p>amended to require all development to consider longevity.</p> <p>3) Proposals for major <u>Developments</u> are required to demonstrate how they have considered the lifecycle of buildings and public spaces and the materials used to construct them to reduce lifetime carbon emissions.</p> <p>This policy should place carbon emission reduction in the context of sustainable development. This will be important, for example, in guiding decisions relating to old buildings. Some older buildings of value will be irreplaceable assets in a sustainable development context and appreciation of this will be important in making informed decisions about the relative merits of adapting or replacing any such buildings.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/327
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	Policy D13: Climate Change Adaptation 3c) Delete c) retention and incorporation of green and blue infrastructure as far as possible.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/328
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D15: Renewable and Low Carbon Energy Generation and Storage In para 3) insert: 3) Proposals are required to demonstrate that the design of the scheme, <u>including positioning, access and any lighting or fencing</u> , has sought to minimise visual impacts and that the management of the site will maximise

	<p>opportunities for biodiversity while avoiding practices that are harmful to biodiversity.</p> <p>A paragraph is needed in the policy on the special considerations that apply in the AONB and stressing the importance of not harming the natural beauty of the landscape. Prominent wind turbines would be particularly relevant in this respect.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/329
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets</p> <p>In para 1) insert:</p>

	1) All development proposals affecting designated heritage assets, including curtilage buildings and structures and their setting <u>and appreciation in views</u> , are required to be supported by an evidence based Heritage Statement.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/330
Respondent ID	8556385
Respondent Name	Guildford Residents Association, EGRA (Ms Amanda Mullarkey)
Agent Name	
Section	Policy D21: Enabling Development and Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D21: Enabling Development and Heritage Assets</p> <p>In para 1) insert:</p> <ol style="list-style-type: none"> a) the enabling development would not materially harm the significance of the heritage asset or its setting <u>or appreciation by the public</u>, and is the minimum necessary required to address the ‘conservation deficit’;

	<p><u>#) the enabling development, including vehicular access, parking and infrastructure provision, would not harm rural character or the purposes of the AONB</u></p> <p>1. b) the enabling development is necessary to solve the conservation needs of the asset or place and not the financial needs of the present owner, <u>including public bodies</u>, or to compensate the price paid for the asset or site;</p> <p>In para 5.451 delete the final bullet point. Provision of employment opportunities is not an appropriate justification in this context.</p> <p>The accompanying text should refer to assets owned by a public body having been acquired for the benefit of the people of Guildford. It should also refer to avoiding urbanisation of the countryside which is distinct from avoiding material harm to the setting of a heritage asset and its setting, which is sufficient in the context of an urban heritage asset.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/331</p>
<p>Respondent ID</p>	<p>8556385</p>
<p>Respondent Name</p>	<p>Guildford Residents Association, EGRA (Ms Amanda Mullarkey)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy ID11: Parking Standards</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is Sound?</p>	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>POLICY ID11: Parking Standards</p> <p>We strongly support promotion of public transport, car clubs and electric vehicle charging facilities, all of which are currently appalling in Guildford apart from buses to park and ride car parks and to the university.</p> <p>We strongly oppose the use of maximum parking standards in the mistaken belief this is a good way to drive behaviour change.</p> <p>The priority should be to reduce personal car use and promote more benign power sources, not necessarily to reduce car ownership. It is availability of attractive public transport that meets needs that drives behaviour change not removal of parking spaces. Inadequate parking provision simply pushes parking into surrounding residential areas, adds to on street parking issues and leads to loss of greenspace, landscaping and permeable surfaces in development as occupants seek to create off street parking spaces over time.</p> <p>Instead, policy should provide for adequate well landscaped parking that does not dominate the street scene. Provision should be consistent with access to sustainable means of travel, availability of convenient electric/hydrogen powered car club vehicles, space for personal electric/hydrogen vehicles where required including vans for business use and recreation, and space for delivery vehicle and visitors.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/293
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	

Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>H6: Housing Conversion and Sub-division</p> <p>Comment</p> <p>The policy should have a 1 d) statement that covers the quality of conversion and sub-division.</p> <p>This needs to ensure that matters such as floor to ceiling heights, area of glazing, thermal insulation, thermal gain, sound transmission, safe and attractive common parts etc. are to a high and futureproof residential standard.</p> <p>Where a building was originally constructed for non-residential purposes, this can become even more crucial.</p> <p>Although outside the scope of the DMP subdivision of dwellings causes a number of issues and is unlikely to make bed-sit accommodation cheaper than similar space in an HMO. Management and long-term maintenance of common areas can be very difficult if the units are sold off individually having negative impacts on neighbours.</p> <p>There are good planning reasons to apply conditions that supports high quality conversion and sub-division.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/294

Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H7: Review Mechanisms</p> <p>Comment</p> <p>Viability Statements should be made public in all cases most developments don't make these public, but some significant ones do – this should be mandated. The Local Plan and recent windfall development proposals have a number of schemes of circa 200- 500 dwellings on restricted sites. Some of these schemes might be usefully used for mixed use development with 'public good' being provided. The policy should be clear that the council will consider affordable housing being delivered outside the site either by contributing to council schemes or the provision of other sites.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/299
Respondent ID	8561377

Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>H8: First Homes</p> <p>Comment</p> <p>For all forms of affordable housing, it's essential that applicants agree to a post-construction review of the affordable housing contribution. This policy must be enforced as a matter of course since in negotiation developers are likely to make a final offer of an initial contribution provided there is no future review. Such concessions would be contrary to public policy because any concession would be seized upon as a precedent. This policy objective and non-negotiability should be made explicit.</p> <p>To ensure that the price of first homes is not manipulated those units need to be identical to non-discounted units. Even so there is a risk that those receiving discount will agree a higher base price of those buying a similar non-discounted unit, thereby frustrating government policy. Monitoring land registry prices would be insufficient verification since various incentives are typically negotiated individually on each unit. Developers should be required to provide full disclosure of all terms in order to verify that the appropriate discount has been given and to verify that this form of affordable housing policy is effective.</p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/300
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness</p> <p>Comment</p> <p>The society has three main proposed changes</p> <ol style="list-style-type: none"> The wording could be made crisper and easier to understand in places by splitting paragraphs into bullet points. The Accurate Visual Representation Para 5.9 in the Reasoned Justification should be included in the Policy itself. Policy D4 should be positioned to accommodate new SPD's or Area Action Plans etc coming forward as a result of the Town Centre Master planning exercise now underway. The policy at two states - Development proposals are required to have regard to relevant national and local design guidance or codes. <p>The Society would like to see more explicit guidance by reference to what constitutes good design using examples of good and bad. This could include referring to Design Guides/Codes and SPD's whether in place e.g. Strategic Sites –</p>

SPD, sites such as Weyside, or in plan.

Design springs from a principle, a philosophy. Its output may be visual, but to be valid and of quality, its inputs are multi-faceted. It considers the long-term performance of the building, so how the maintenance and management of the property (for example a block of flats to be sold off on long leases) has informed the design needs to be expressly outlined in documentation seeking to demonstrate that the design is of good quality. The design also needs to consider the needs of a range of occupiers over the decades and centuries for which the building may exist. So properties developed to market to 1st time buyers or for buy-to-let (for example 2-bedroom, 2-bathroom flats) may subsequently be occupied by pensioners: well-designed internal layouts, services and features, down to detail such as switches and handles, should reflect this to comply with D4 1 j) Lifespan..

Note this doesn't mean just referring to the past and looking at other Design Guides from other LPA's may be appropriate. In the past GBC design guides have included many vernacular features, quite often from the arts and crafts movement, so developers have taken these and added them to new mass market housing where they look out of context because the feature originally typically had some function or reflected human craftsmanship which the modern version totally misses.

Finally there needs to be a comment on the Development Design Process for Major or Significant Sites; where the DMP should refer to the desirability of Architectural Competitions to get a range of design options and also confirm the requirement that groups such as Design Southeast should be consulted..

Policy

1) Development proposals are required to demonstrate how they will achieve the ten characteristics of well-designed places as set out in the National Design Guide:

- a. Context – enhances the surroundings
- b. Identity – attractive and distinctive
- c. Built form – a coherent pattern of development
- d. Movement – accessible and easy to move around
- e. Nature – enhanced and optimised
- f. Public space – safe, social and inclusive
- g. Uses – mixed and integrated
- h. Homes and buildings – functional, healthy and sustainable

-
- i. Resources – efficient and resilient
 - j. Lifespan – made to last

2) Development proposals are required to have regard to relevant national and local design guidance or codes. **(See comments above)**

3) Development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place.

- a) respond positively to the history of a place,**
- b) value significant views (to and from), surrounding context,**
- c) surrounding context including urban space and public realm,**
- d) built and natural features of interest,**
- e) prevailing character, including building heights and scale,**
- f) landscape and topography.**
- g) heritage**
- h) skyline**

4) The use of innovative design approaches, including use of materials and construction techniques, will be supported where this presents an opportunity to create new or complementary identities that contributes to and enhances local character.

- 5) Development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to:
- a. Layout – settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines.
 - b. Form and scale of buildings and spaces – height (See comment above), bulk, massing, proportions, profile and roofscapes/Skylines
 - c. Appearance
 - d. Landscape – landform and drainage, hard landscape and soft landscape
 - e. Materials
 - f. Detailing

-
- 6) Development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including:
- a. the site size, characteristics and location;
 - b. the urban grain of the area and appropriate building forms, heights and sizes for the site; and
 - c. the context and local character of the area.

7) Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.

8) Development proposals are expected to be designed so as not to hinder the potential future delivery of adjoining development sites.

9) Development proposals should ensure that Accurate Visual Representations (AVRs) are made available to allow assessment of the likely impact of development on the townscape (including Streetscape)/landscape setting or nearby heritage asset.

AVRs are expected to be submitted from views that have been agreed with the Council.

a) In the town centre, they will be expected for any visually prominent proposals or proposals for additional storeys.

b) In other conservation areas and the AONB, they will be expected on any major development proposals whilst,

c) for the rest of the borough, they are likely to only be necessary on significant development proposals.

Applicants will also be required to submit digital models of proposed developments so that their impacts can be assessed independently by the Council through the use of visualisation software. The council currently uses VuCity.

The computer models may also be made available to the public by viewing facilities.

Masterplanning and Design Codes

	<p>10) Strategic sites listed in LPSS 2019 Policy D1(13) are required to produce masterplans and follow a Design Code approach through the planning application process. This will require a Design Code to be agreed prior to the granting of full or reserved matters planning permission for any phase of the development. Where outline planning permission has been agreed subject to Design Code agreement, any relevant Reserved Matters applications which are submitted without the Design Code being agreed will be refused.</p> <p>11) Masterplans and Design Codes will also be required for any site that will be developed in more than one phase or by more than one developer. Failure to agree a Design Code approach is likely to result in the refusal of an application.</p> <p><u>12) Work is underway on the production of a Town Centre Masterplan this may result in supplementary policies that will have to be adhered too when designing new developments.</u></p> <p>13) A design code will be required for any other site or part of a site where it is considered necessary to set design parameters.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/301
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5: Protection of Amenity and Provision of Amenity Space</p> <p>Comment Many of the changes to D5 are welcome.</p> <p>The Society would propose that</p> <p>Unacceptable impact applies to other types of neighbouring properties e.g. Health Centre. Although it cannot always be provided all residential developments should provide dual aspects. We also propose that Workplaces needed to be included particularly with Working From Home or in small local shared spaces becoming more prevalent.</p> <p>Policy Protection of amenity</p> <p>1) Development proposals are required to avoid having an unacceptable impact on the living or working environment of existing residential properties and in some case workplaces or resulting in unacceptable living conditions for new residential properties, in terms of:</p> <ol style="list-style-type: none"> a) Privacy and overlooking b) Visual dominance and overbearing effects of a development c) Access to sunlight and daylight d) Artificial lighting e) Noise and vibration f) Odour, fumes and dust <p>Provision of amenity space</p> <p>2) All new build residential development proposals, including flatted development, are expected (Does this need strengthening to Should?) to have direct access to an area of private outdoor amenity space.</p>

	<p>In providing appropriate outdoor amenity space, both private and shared, development proposals are required to:</p> <ul style="list-style-type: none"> a) take into account the orientation of the amenity space in relation to the sun at different times of the year; b) address issues of overlooking and enclosure, which may otherwise impact unacceptably on the proposed property and any neighbouring properties; and c) design the amenity space to be of a shape, size and location to allow effective and practical use of the space by residents. <p><u>d) To increase amenity designs should consider providing dual aspects wherever possible.</u></p> <p>3) All balconies or terraces provided on new flatted development proposals are required to be:</p> <ul style="list-style-type: none"> a) designed as an integrated part of the overall design; and b) a minimum of 4sqm. <p>4) Development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential building separation distances.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/302</p>
<p>Respondent ID</p>	<p>8561377</p>
<p>Respondent Name</p>	<p>Guildford Society (Mr Alistair Smith)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy D5a: External Servicing Features and Stores</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is Sound?</p>	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5a: External Servicing Features and Stores</p> <p>Policy</p> <p>1) Development proposals are required to demonstrate that:</p> <p>a) bin storage, cycle parking delivery set down lockers, and electric vehicle charging points, whilst being designed to meet practical, including easy access, needs, are integrated into the built form and do not detract from the overall design of the scheme or the surrounding area; and</p> <p>b) external servicing features are designed as an integrated part of the overall design or are positioned to minimise their visual impact.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/303
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy D6: Shopfront Design and Security
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	Policy D6: Shopfront Design and Security Comment This policy should refer to the GBC Guidance on Shopfront Design and Security in Historic areas.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/304
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	D7: Advertisements, Hanging Signs and Illumination Comment Para 5.58 Highlights the economic benefits of advertising. There is discussion of the proliferation of advertising. The Society believes the policy needs to highlight that proliferation is a Nil-Sum game and as well as harm to the Built

	<p>environment can cause light pollution etc.</p> <p>The policy needs to allow for refusal of consent on the grounds of proliferation.</p> <p>There should be an presumption that moving image, television screen type advertisements should be banned, particularly in Heritage areas, as there are few locations where they are acceptable.</p> <p>We note that compared with the withdrawn policies 2003 Policies G8 and G9 the proposals are considerably stronger but are considerably weaker than the GBC Design Guidance for Advertisement and Signs. At the least, the new Policy should make affirmative reference to the Guidance.</p> <p>The society would like to see a presumption against LED screen type advertisements particularly in heritage areas, and a presumption against freestanding advertisements on paved areas whether as part of telephones, bus shelters or similar." (Q18)</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/305
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy D12: Sustainable and Low Impact Development

Comment

We welcome this revised policy. One comment is that energy efficient heating etc can have design impacts e.g. Air Source Heating Heat Exchangers this policy need to cross refer to D4 on Design?

Should the notes have clear mention of standards such as Passivhaus as standards to be aimed at?

At D12 3) does this need to encompass all developments?

Should it be noted that off-site fabrication is encouraged if it lowers impact of building work?

Finally, the Policy should refer to the adaptability in buildings. The era of rebuilding every 60 years may be coming to an end and buildings will need to adapt by reconfiguration to new uses and occupants.

Policy

Fabric first

1) Development proposals are required to demonstrate how they have followed a ‘fabric first’ approach in line with the energy hierarchy.

Embodied carbon

2) Development proposals are required to demonstrate that embodied carbon emissions have been minimised by:

a) sourcing materials locally where possible; and

b) taking into account the embodied carbon emissions of materials based on information provided in a respected materials rating database.

3) Proposals for major development are required to demonstrate how they have considered the lifecycle of buildings and public spaces and the materials used to construct them to reduce lifetime carbon emissions.

4) **Adaptability Proposals for Development should consider how basic Building Structures can handle changing requirements over time e.g. Mixed Use development may need accommodate varying proportions of**

	<p><u>Commercial vs. Dwelling space</u></p> <p>Energy improvements 5) Development proposals that will improve the energy efficiency and carbon emission rate of existing buildings to a level significantly better than the Council's adopted standards or national standards for new buildings, whichever is most challenging, are encouraged.</p> <p><u>Environmental Technology e.g. Air Source Heating, PV Cells can have a considerable impact on the look of a building and this must be considered to conform to Policy D4.</u></p> <p>Waste 6) Proposals for major development, and development proposals that involve the demolition of at least one building and/or engineering works that involve the importation or excavation of hard core, soils, sand and other material, are required to submit a Site Waste Management Plan.</p> <p>Water efficiency 7) New developments are expected to incorporate measures to harvest rainwater and conserve water resources and, where possible, water recycling/reuse systems.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/306</p>
<p>Respondent ID</p>	<p>8561377</p>
<p>Respondent Name</p>	<p>Guildford Society (Mr Alistair Smith)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy D16: Designated Heritage Assets</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	

Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets</p> <p>Comment Although unlikely to feature in the current planning regulations, it is worth noting that Heritage Assets also have an economic significance. Guildford's High Street is a classic example with shoppers attracted to grouping of heritage assets in an interesting location. If this was lost the centre of the town would cease to attract visitors.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/307
Respondent ID	8561377
Respondent Name	Guildford Society (Mr Alistair Smith)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>POLICY ID11: Parking Standards</p> <p>Comment The Future of the motor car is uncertain it is possible that numbers of cars per household may decrease as alternately fuelled vehicles are more expensive, active travel may take over some travel, public transport can improve.</p> <p>Should a comment be added to Reasoned Justification that:</p> <p>New developments should consider how car parking is planned to allow for reversion of parking areas to open space, or more accommodation. An example is that small temporary at edge Multi-storey parking might be provided that can be redeveloped as car numbers decline</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/50
Respondent ID	38117537
Respondent Name	Hallam Land Management Ltd (c/o agent c/o agent)
Agent Name	LRM Planning Ltd. (Ms Kate Coventry)
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	No
Do you consider this section of the document is Sound?	No
Do you consider this section of the document complies with the Duty to cooperate?	

Comment

The policy, as set out, is in conflict with the Environment Act and the minimum requirement of 10% biodiversity net gain. Therefore, this policy is **unsound** and should be amended.

The Environment Act sets out the national policy requirement for a minimum of 10% biodiversity net gain. Although the Council have stated that they recognise that they are departing from this national requirement, they consider their position to be justified. This is not agreed, and it is not considered that the Council's conflict with the Environment Act is acceptable.

The Council recognise the Natural Environment Topic Paper and specifically paragraph 3.46 which highlights the importance of ensuring alignment with the national approach to biodiversity net gain by removing exemptions that were proposed. Similarly, the most recent consultation on the Biodiversity Net Gain Regulations and Implementation states, at page 7, that "*mandating biodiversity net gain through the Environment Act will establish a consistent set of requirements and necessary exemptions which give developers clarity as to how they can meet their net gain obligations.*"

Should the Council continue to seek 20% then there will be instances where planning permission is refused on the grounds of this policy, despite according with national legislation. In effect, there would be Development Plan policy which attracts the weight of Section 38(6) of the Act constantly at odds with another Statute.

The Environment Act does not set a maximum quantum of net gain, through using a higher percentage the Council will increase costs put on developers and could run the risk of a series of unviable schemes. It should also be recognised that biodiversity net gain calculation is site specific and that until the scheme is prepared the requirement for 20% across all sites is not known to be achievable. Unless additional viability evidence and testing is prepared for this consultation on a range of sites then it is unreasonable to require all sites across the Borough to achieve 20%. This uncertainty is reflected in the national 10% minimum with the encouragement to seek higher levels where possible.

Specifically, and in regard to the strategic sites allocated within the adopted Local Plan Strategy and Sites document, there is concern that there is conflict between this proposed policy and Policy ID4. Policy ID4 states at "*new development should aim to deliver gains in biodiversity where appropriate.*" Should the proposed P6/P7 policy be adopted then strategy sites would have two different approaches to net gain. One which *aims* to deliver gains, and one which *requires a minimum of 20%*. Similarly, the Strategic Development Framework Supplementary Planning Document requires at paragraph 3.2.32 that "*proposals will be expected to...provide net gains.*" The strategy sites

	<p>would also be required to accord with national legislation through the Environment Act and would be required to deliver 10% net gain.</p> <p>It is acknowledged that the Council have published evidence of a viability assessment. However, there is concern regarding the assumption that 75% of the net gain will be delivered on site with the remaining 25% delivered off site. This relates to two key matters: the first being the quantum of land required on site to deliver the net gain, which would reduce developable area in turn reducing the number of houses delivered on site; and secondly, the ability for developers to also seek out 25% off site net gain which is both costly and there is no clear indication of where this off site land would be found.</p> <p>The above demonstrates that although the Council have set out the contribution requirements and evidence in regards to net gain, there is conflict with paragraph 34 of the NPPF whereby the loss of developable land to meet the 20% net gain and the costly off site delivery potentially threatens the viability of all future schemes across the Borough. This threat to viability could undermine the deliverability of the plan and the ability for the Council to deliver the quantum of housing set out at Policy S2 of the adopted Local Plan Strategy and Sites document.</p> <p>It is recommended the policy is amended to reflect a percentage of biodiversity net gain that accords with national legislation, and should the Council wish to seek higher percentages, this should be encouraged, not required.</p>
What changes do you suggest should be made to the document?	It is recommended the policy is amended to reflect a percentage of biodiversity net gain that accords with national legislation, and should the Council wish to seek higher percentages, this should be encouraged, not required.
Files	220208 Development Management Policies Consultation.pdf
Comment ID	LPDM21B/51
Respondent ID	38117537
Respondent Name	Hallam Land Management Ltd (c/o agent c/o agent)
Agent Name	LRM Planning Ltd. (Ms Kate Coventry)
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is	No

Legally Compliant?	
Do you consider this section of the document is Sound?	No
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>This policy duplicates the requirements set out in the Building Regulations. It is considered this policy is unsound and should be deleted.</p> <p>The policy proposes that all new dwellings must achieve a reduction in carbon emissions of at least 31% compared to the existing targets in the Building Regulations. The Building Regulations is expected to introduce this requirement in 2025.</p> <p>In accordance with the National Planning Policy Guidance (Paragraph: 009 Reference ID: 6-009-20150327) local planning authorities when setting any local requirements for a building's sustainability should do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards.</p> <p>There is a risk that should this local policy be adopted it becomes outdated with any updates to the national Building Regulations, therefore this policy is at risk of conflicting with national standards. The Government is introducing standards for carbon emissions through the Building Regulations; therefore, this policy should be deleted, and this matter controlled through national policy.</p>
What changes do you suggest should be made to the document?	The Government is introducing standards for carbon emissions through the Building Regulations; therefore, this policy should be deleted, and this matter controlled through national policy.
Files	220208 Development Management Policies Consultation.pdf
Comment ID	LPDM21B/82
Respondent ID	8573793
Respondent Name	Harry Eve

Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Given that the Council has taken action to phase out the use of pesticides (for clarity - including herbicides) there is an opportunity for this approach to be included to ensure that the use of pesticides is not permitted and alternative approaches must be used throughout the development. Spraying was chosen as the means to convert existing grassland into a seedbed for “wildflowers” under recent applications. It would be far preferable to achieve an improved habitat just by introducing a suitable management regime to the existing grassland – possibly introducing some locally sourced plants that are absent but would be expected to occur in a similar, local, mature site.</p> <p>Thank you for including the point concerning avoidance of chemical controls in policy D15 (5.257).</p> <p>Similarly, alternatives to chemical control of Oak Processionary Moth should be used where control is deemed necessary as part of a development.</p>
What changes do you suggest should be made to the document?	<p>Something robust on the lines of :</p> <p>The use of pesticides (including herbicides) must be avoided throughout the development and alternative, non-chemical approaches must be used for any control needed or actions aimed at achieving Biodiversity Net Gain.</p>
Files	
Comment ID	LPDM21B/83
Respondent ID	8573793

Respondent Name	Harry Eve
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Please consider increasing the buffer area around ancient woodland. The issues that require a buffer are acknowledged in the additional wording and I see no reason why GBC should not send out a stronger message by specifying a minimum that is higher than the minimum prescribed by Natural England. It is regrettable that the Local Plan includes sites adjacent to ancient woodland.</p> <p>Please include a requirement that TPOs will be applied to significant trees as part of any approval given.</p> <p>Please include a requirement that if significant trees are removed prior to an application this will result in refusal.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/84
Respondent ID	8573793
Respondent Name	Harry Eve
Agent Name	

Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	With regard to the reply to my question under the Reg18 consultation, I agree that traffic signage may be obligatory. However, the case I had in mind was an unnecessary active information sign installed in the line of view and, if I recall correctly, reminding drivers about COVID at a point where they need to concentrate on a pedestrian crossing near a school. It is not clear to me whether GBC have any involvement in the decision-making for these signs.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/85
Respondent ID	8573793
Respondent Name	Harry Eve
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>I am concerned about how much weight will actually be given to each aspect in terms of resisting inappropriate infilling. For example, in 5.100 it is stated “Inappropriate access arrangements <i>may</i> result in development proposals being resisted”. Surely it is entirely unacceptable to allow inappropriate access arrangements. It is not a matter to be glossed over especially as it may involve safety issues. Approval by “Stakeholders at SCC and GBC” should not be an end to the matter. Issues pointed out by residents when an application materialises must be taken into account regardless of any pre-application discussions and that should be made clear to applicants in advance.</p> <p>I am concerned about the insidious degradation of places, and loss of wildlife corridors and stepping-stones, that arise from infilling. Backland and large garden development are among the worst examples of place-breaking.</p>
What changes do you suggest should be made to the document?	I suggest that the actual policy wording should also mention the aspects covered in 5.96, which include biodiversity, and 5.100 as a requirement. Examples of inappropriate access arrangements could include safety issues, breaking up a roadside landscape feature such as a bank or tree line and removal of significant trees.
Files	
Comment ID	LPDM21B/86
Respondent ID	8573793
Respondent Name	Harry Eve
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	The reply to points that I made under the Reg18 consultation concerning carbon costs was that they were too strict and would be considered unreasonable. However, it is becoming increasingly clear that if we are to protect younger and future generations then strict measures are necessary – especially in the realm of planning which cannot be regarded as exempt from the Climate Change Emergency (nationally and locally). Construction is a major source of upfront emissions and ongoing emissions are not the only issue. GBC has an opportunity to lead the way on this and it could encourage residents to do likewise.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/87
Respondent ID	8573793
Respondent Name	Harry Eve
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Is there any reason why the 31% and 27% standards cannot be set higher ?
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/99
Respondent ID	15746081
Respondent Name	Highways England (Patrick Blake)
Agent Name	
Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy H6: Housing Conversion and Sub-division</u></p> <p><u>Policy D9: Residential Infill Development</u></p> <p>The parking implications on the immediate locality are explicitly addressed by Policies H6 and D9 and the supporting text. The cumulative impacts of development on the broader transport system aren't addressed. We recommend Guildford Borough Council actively monitor and manage residential infill and housing conversions with a view to pre-empting traffic issues stemming from the cumulative effects. We are supportive of the sustainable principles underpinning the preferred approach to residential intensification with a need to prioritise delivery of walking and cycling infrastructure. Without sufficient transport infrastructure capacity, large scale intensification of use can pose a risk to the SRN in terms of safety and capacity. Therefore we request that a reference is provided to undertaking Transport Assessments where the scale of the intensification would make this an appropriate action to ensure that this risk is mitigated.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/100
Respondent ID	15746081
Respondent Name	Highways England (Patrick Blake)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy H6: Housing Conversion and Sub-division</u></p> <p><u>Policy D9: Residential Infill Development</u></p> <p>The parking implications on the immediate locality are explicitly addressed by Policies H6 and D9 and the supporting text. The cumulative impacts of development on the broader transport system aren't addressed. We recommend Guildford Borough Council actively monitor and manage residential infill and housing conversions with a view to pre-empting traffic issues stemming from the cumulative effects. We are supportive of the sustainable principles underpinning the preferred approach to residential intensification with a need to prioritise delivery of walking and cycling infrastructure. Without sufficient transport infrastructure capacity, large scale intensification of use can pose a risk to the SRN in terms of safety and capacity. Therefore we request that a reference is provided to undertaking Transport Assessments where the scale of the intensification would make this an appropriate action to ensure that this risk is mitigated.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/101
Respondent ID	15746081
Respondent Name	Highways England (Patrick Blake)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network</u></p> <p>We are generally supportive of the principles behind Policy ID10 and the modal shift from single occupancy vehicles to more sustainable methods of travel. We request that we are consulted as the plans for the Guildford Borough Cycle Network develop, in particular for any locations in close proximity to National Highways assets.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/102

Respondent ID	15746081
Respondent Name	Highways England (Patrick Blake)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy ID11: Parking Standards</u></p> <p>The proposed policy covers a wide range of uses with maximum, minimum or expected numbers of parking spaces. One of the biggest opportunities for managing down traffic demand on the SRN is associated with limiting parking spaces at a destination, but this is particularly successful when policies such as this are supported by the delivery of other sustainable transport measures. We note that there are many references to improvements to pedestrian and cycle networks. However in terms of managing demand on the SRN and reducing single occupancy vehicle trips, we would expect a reference to both existing and planned bus and rail services.</p> <p>We have no additional comments to the <u>Draft Parking Supplementary Planning Document 2022</u> not already covered in our comments to ID11 above.</p> <p>National Highways supports Guildford Borough Council’s commitment to work with partners to consult on potential developments coming forward within the borough.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/233
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Introductory sections
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Para 1.21. SPDS.</p> <p><u>A list of planned SPDs needs to be provided. We question whether all subsidiary documents must be immediately withdrawn; some may need to be kept until a replacement SPD is produced. In particular we ask that CA appraisals (that have been a material consideration in determining planning applications) be formally retained as part of the Plan.</u></p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/234
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	

Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H5 (Extensions).</p> <p>This policy document should not be a vehicle to promote a particular type of development and we ask for this section to be removed. While extensions, particularly loft conversions, often have a legitimate justification, in many cases they also have many disadvantages that have not been mentioned; these include diversion of resources away from provision of the new homes that we need, inefficient use of materials and energy (lack of sustainability), loss of the stock of smaller homes that we desperately need, loss of local character, loss of garden space, ugly appearance spoiling the street scene and local character, and compromising use of pavements. They always have a serious impact on neighbours, for which there is no compensation; these include loss of light and privacy, reduction in house value, and major and long-lasting disturbance and nuisance during extension works.</p> <p><u>We ask that this policy be clarified as follows:</u></p> <p><u>Extensions must not increase the size (volume) of the house from that of the original building by more than 40% or beyond 200sqm. Where extensions have previously been made to the house this criterion must be applied to the cumulative size increase from the original.</u></p> <p><u>Driveways and pavement crossovers must not be multiplied.</u></p> <p><u>Permitted development rights for extensions to be removed from sensitive areas.</u></p> <p><u>Prohibition of house extensions for 5 years after the purchase, including for new houses. Extensions must match the character / design / materials of the original.</u></p>

	<i>Over recent years there has been a trend to having extensions in a contrasting / “contemporary” style; some houses have been doubled in size. Both have spoilt the character of the area in appearance and in its community spirit.</i>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/235
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H6: Housing Conversion and Sub-division</p> <p><i>This must be recognised as a possibility for the large mansions now being built as an investment rather than meeting a need. Some years ago, the conversion of large Victorian homes into flats was commonplace, and this provided some of the small dwellings then required. The problem was inadequate maintenance so that some conversions ended up degrading the area. Some have now been converted back to single dwellings</i></p>

	<u>The required amenity space needs quantifying, perhaps by reference to later sections of the document; if it is impossible to provide this on the site of the building to be converted the developer must arrange by purchase or agreement, extra new open space withing easy reach of the conversion. A robust communal maintenance arrangement must be provided and approved by the Council</u>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/236
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy H8: First Homes <u>There needs to be a prohibition of any extension of these homes for a period, perhaps 25 years.so that their original purpose is maintained.</u>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/237
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P6/P7: Biodiversity in New Developments.</p> <p>This policy is generally welcomed. However, it is mainly aspirational for non-BOA areas. Some specific requirements could be set:</p> <p><u>Landscaping proposals must give details of planting. They should provide native, natural, plants, and not quick maturing ones (such as Lelandii, Photinia, Laurel). At least one tree to be provided in a garden over a certain size. Hard surfacing must be minimised.</u></p> <p><u>TPOs will be applied to new trees that are expected to grow to become significant in the area.</u></p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/238
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness</p> <p>5.9 Accurate Visual Representations (AVRs).</p> <p><u>These must include normal human visual field of view, i.e. approx. 45deg cone of vision, or as a normal camera view; all major proposals must include these. Where wide angle views are used to give an impression of the whole building these must carry a warning that they will not be seen as such in reality.</u></p> <p><i>Experience. Most major proposals include “artists impressions” without any caution to viewers, and usually give a gross understatement of how dominating the building would be: when built comments are often made such as “we did not realise it would be this big.”</i></p> <p>5.13 and 5.15.</p>

We do not agree that no dwelling density limits should be set. *Prior to 2012 the requirement was that density for new development should be 30-50dph, with higher densities allowed by the Res Des Guide within 800m of the designated town centre. This was not a perfect criterion but it was fair, easily understood, and was proven to be effective in many planning applications, and also their appeals when they occurred. It had provided some control on the open space provided and the height of a building, as well as the density itself.* To have no criteria at all leaves developers free, without challenge, to pack into a site as much as they can.

We ask for the previous 30-50dph limits to be reinstated, except for:

Designated sites where dwelling numbers are already specified

Designated town centre - a limit of 130dph would be reasonable

Area within 400m of the centre boundary, or the main station where this falls

outside the town centre boundary - 85 dph.

Conservation Areas where the average density is already 50dph or higher where no extra dwellings are allowed.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/239

Respondent ID

8559297

Respondent Name

Holy Trinity Amenity Group (Robert Bromham)

Agent Name

Section

Policy D5: Protection of Amenity and Provision of Amenity Space

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5: Protection of Amenity and Provision of Amenity Space</p> <p>This section identifies the main issues, but, apart from balcony space does not provide the specific rules needed from a policy document. <u>We suggest that</u></p> <ol style="list-style-type: none"> 1. <u>Ridge heights of buildings not to exceed those of neighbouring properties except to reflect changes in the natural land levels.</u> 2. <u>No clear side windows to any habitable room.</u> 3. <u>Screens to rear balconies to prevent direct sideways views from them.</u> 4. <u>Loss of light to rear gardens to be quantified, e.g loss not to exceed 30 percent of that available if the building did not exist.</u> 5. <u>All dwellings that are not flats to have at least 6sqm of open surfaced amenity space, to provide for bicycle storage, bin storage, and natural drying of washing, and also at least 6sqm of natural green space.</u>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/240
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	

Section	Policy D5a: External Servicing Features and Stores
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5a: External Servicing Features and Stores</p> <p>Item 1) a) does not agree with the definition of 5.34 <i>and is more appropriately included in D5</i></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/241
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D6: Shopfront Design and Security
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Policy D6: Shopfront Design and Security.</p> <p>While we would agree with most of the aspirations, they are of no policy value unless there is a means of enforcing them.</p> <p><u>We ask that, within conservation areas (and not just for listed buildings) a planning application be required for all new shopfronts and changes to existing ones. If necessary deemed consent should be removed if this is in conflict with this control.</u></p> <p><u>The increasing use of shopfronts in Conservation Areas as advertising hoardings needs to be more rigorously controlled.</u></p> <p><i>We believe that this was the practice in the past; the SPG on this subject makes no reference to its application being limited to listed buildings. Recent shopfront changes in the High Street clearly degrade the Conservation Area quality.</i></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/242
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D7: Advertisements, Hanging Signs and Illumination.</p> <p><u>We ask that:</u></p> <p><u>Within conservation areas, and not just for listed buildings, a planning application be required for all new shopfronts / advertisements and changes to existing ones. We believe that this was the practice in the past; the SPG on this subject makes no reference to its application being limited to listed buildings. Recent advertising changes in the High Street clearly degrade the Conservation Area status</u></p> <p><u>If necessary deemed consent should be removed if this is in conflict with regulation, and an Advertisement Control area designated.</u></p> <p><u>Illuminated signs to be not allowed in Conservation Areas, except for businesses whose main trade is after dark.</u></p> <p><u>Advertising A boards on public space be prohibited from the Town Centre Conservation Area. These are unnecessary and outmoded and create clutter and trip hazards for pedestrians.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/243
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	

Section	Policy D8: Public Realm
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D8: Public Realm</p> <p>Most of the public realm is under the control of SCC Highways, and it is therefore unclear what legitimacy, or use, this section has in the Borough Council Plan. <u>This must be clarified</u>. While we would support most of the general, and usually obvious aspirations given, it is disappointing that none of the issues we raised in the previous consultation are mentioned except for street trees. Some of these could be addressed by GBC. <u>They are repeated below (It.6 revised)</u>:</p> <p><u>1.Inadequate maintenance of surfaces</u>. These are crucial to create an inviting public realm. They are currently very poor with uneven surfaces and an ever-spreading rash of “temporary” tarmac repairs to historic stone pavements. Priority must be given to obtaining adequate maintenance before any redevelopments are considered.</p> <p><u>2.Risk of Privatisation of streets that form the public realm</u>.</p> <p>There have been attempts to privatise some streets, notably in connection with the North Street re-development. We, and other organisations, are opposed to the loss of ancient rights of movement around our town centre. The question may arise again with the latest North Street redevelopment.</p> <p>3. <u>Lack of Pedestrianisation</u>. This, more than anything else, is responsible for degradation of our public realm. Guildford centre is still dominated by vehicles in a way that few other towns are.</p>

4. Parking on main streets, particularly the “stetted” (cobbled) part of the High Street.

This prevents pavements from being widened. Doors opening across the pavement cause an obstruction to pedestrians.

5. Alcohol Consumption/dining on streets.

Most town centre streets are prohibited areas for alcohol consumption, and this is enforced by police removing bottles from any found doing this. This has worked well and should not be compromised.

6. Dining on streets (item 8 of policy)

We support traditional pavement cafes, and the existing rules (SPG) are reasonable and work well. However, if extended to evening dining additional constraints are needed. As well as the ban on street alcohol consumption there is also now a ban on use of space heaters that restricts use to warm days. Use of on-site space, that may bound onto the highway (public realm), is permissible and proprietors already maximise the use of their outdoor space to extend their active area. Control is also exercised through the Highways licensing system, but this does not address the problem of nuisance to neighbours. We ask that if evening dining on the highway is to be promoted appropriate rules are produced. We also ask that a system of payment be implemented for use of Highways space for pavement cafes and restaurants.

We believe that use is currently free, except for the annual license. It would be reasonable to have a rental payment. The use of the pavement can significantly increase the income of an establishment. This is unfair to establishments who cannot, or are not allowed to, do so.

7. Lack of 20mph limits.

A reduced speed limit makes the adjoining public realm much less hostile.

We ask that street trees are planted in natural ground and not in planters, and that planting in existing streets is included as well as new streets. *We would note that substantial trees, planted in the ground, are often included in artists impressions of new development; they were so shown in both the Alexander Terrace and Tunsgate new*

developments, but in neither case did they appear, and the developments have been poorer by their absence.

We once again ask for clear policies to implement:

1. 24 hour every day pedestrianisation for the setted High Street and associated streets together with some pedestrianisation for North Street, Haydon Place, and the upper High Street.
2. Removal of parking from the High Street and associated streets.
3. Arrangement to ensure proper maintenance of surfaces, particularly pedestrian ones.
4. Commitment to keep and possibly extend the public realm in true public ownership, which at present means adoption of streets and associated squares by the Highways Authority.
5. Commitment to pavement cafes on the highway, with al-fresco dining restricted to the establishment's own property but allowed up any boundary with the Highway.
6. The establishment of some form of payment for use of the Highway for cafes
7. Statement that schemes must follow existing and revised SPG/SPDs on the subject.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/244

Respondent ID

8559297

Respondent Name

Holy Trinity Amenity Group (Robert Bromham)

Agent Name

Section

Policy D9: Residential Infill Development

Do you consider this section of the document is Legally Compliant?

Do you consider this section of the document is

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D9: Residential Infill Development Proposals</p> <p>It is noted that the title of this policy has been changed from “Residential Intensification” which is more appropriate.</p> <p>It is not understood what “piecemeal” development means. Much infilling will be single property, or few. <u>Suggest delete.</u></p> <p>It is not understood why villages have special objectives; these same issues apply in urban areas of the town, particularly those close to countryside. <u>Make these general requirements.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/245
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D10: Noise Impacts
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>Policy D10: Noise Impacts</p> <p>This again says obvious things but lacks any clear definition of what is acceptable. We repeat our request for specific conditions, including:</p> <p><u>No increase in noisy activities or noise spillage will be allowed for established enterprises that adjoin or are close to established residential properties or areas.</u></p> <p><u>New “noise generating” activities must be separated from residential areas.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/246
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Policy D10a: Light Impacts and Dark Skies.</p> <p>We welcome this addition to the plan. However, clear and <u>quantitative limits need to be applied and also reference made to the street lighting that is under the control of SCC.</u> We ask that a condition be made that <u>security lighting does not shine into any close residential property.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/247
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D11: The Corridor of The River Wey and Godalming Navigations</p> <p>We welcome the provision of a specific policy for the River Wey. We support the policies, but we would ask for the following changes / additions:</p>

	<p><u>Under 5.169 clarify that all the navigation is a Conservation Area, but that some sections are also within other Conservation Areas.</u></p> <p><u>We ask that:</u></p> <p><u>There be no further development on the flood plain of the river, and that development beyond this be largely limited to new dwellings and limited provision of commercial services for planned extra residents, with a set back from the river.</u></p> <p><u>The riverside be everywhere returned to a natural state so that a continuous wildlife corridor is available, for the enjoyment of visitors as well as for wildlife.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/248
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Policy D12: Sustainable and Low Impact Development.</p> <p>This must include:</p> <p><u>Reference to GBC declaration of a Climate Change Emergency.</u></p> <p><u>Inclusion of the lost embodied energy in any proposal for building demolition.</u></p> <p><u>Addressing the profligate energy and materials consumption in large new houses – we suggest the banning of new homes above 200sqm floorspace and the provision of new private swimming pools. Open plan homes will be resisted, to ensure that only that part of the building in use need be heated. Three storey and part terraced house will be given preference because of their efficiency in energy and materials consumption</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/249
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Policy D16: Designated Heritage Assets</p> <p>This section is weak and gives no clear planning objective to protect these assets, as the 2003 plan did. Item 3 of the policy should state that “Development proposals which result in harm to, or loss of, the significance of a designated heritage asset <u>will be refused</u> not that they will be “considered in line with national policy and guidance”.</p> <p>Conservation Area Appraisals are not just a “useful tool” that can help with the assessment of significance – they are a “material consideration” in assessing planning applications; this is a potentially a serious side-lining of the appraisals. <u>We ask that this section be rewritten.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/250
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D17: Listed Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Policy D17: Listed Buildings</p> <p>This policy needs strengthening.</p> <p>Add under 2) Repairs, alterations or extensions.. c) reinforce the intrinsic character of the building through the use of appropriate materials, details and building techniques; <u>replace “appropriate” by “original” and add that plastic replicas will not be allowed.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/251
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D18: Conservation Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D18: Conservation Areas

	<p>We are pleased that the option “and high quality schemes that provide a successful visual contrast with their surroundings may also be appropriate” has been removed.</p> <p><u>A clear statement is still needed that a CA Appraisal is a material consideration in application determinations, and that any approval will include a statement that the scheme is consistent with the appraisal.</u></p> <p><u>Article 4 restrictions must be mentioned.</u> It is wrong that these require planning applications only for changes to residential frontages, and do not apply also to commercial units, particularly shops; it is vital that it is also applied to these, particularly those in the historic town centre where modification to the frontages of non-listed buildings must be controlled to maintain the character of the Conservation Area. <u>We ask that all properties are included within the Article 4 requirement.</u></p> <p><u>A clearer policy is required for retention of traditional, and original materials for buildings in Conservation Areas and stating that plastic windows and doors are not allowed if fronting the road.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/252
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D19a: Registered Parks and Gardens
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D19a: Registered Parks and Gardens</p> <p><u>We ask that this includes a policy to register (nationally) more of these. We would like to see the Castle Gardens so registered; they are now of historic as well as horticultural importance</u> (currently only locally registered). The Plan needs to state that the responsibility for doing this lies with the Council.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/253
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy D20: Non-designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D20: Non-designated Heritage Assets.

	<p>We would support the requirement that</p> <p>“Development proposals are expected to preserveNon -designated Heritage Assets...”. However, our understanding is that locally listed buildings can now be demolished without planning permission. We ask that:</p> <p><u>The previous policy to treat Locally listed buildings the same as those statutorily listed be retained, except where there is an appeal that will be decided according to national rules.</u></p> <p><u>Planning Permission be required for demolition of any locally listed building. _</u></p> <p><u>The status of buildings designated in Conservation Areas Appraisals as “buildings of local Character” or “buildings of townscape merit” be noted as having some protection.</u></p> <p>As buildings from the Victorian period become older and fewer the need to upgrade designation to statutory listing becomes more important. We ask that a requirement be included <u>to consider upgrading local to national listing as buildings become older and there are fewer of their type.</u></p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/254</p>
<p>Respondent ID</p>	<p>8559297</p>
<p>Respondent Name</p>	<p>Holy Trinity Amenity Group (Robert Bromham)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy D21: Enabling Development and Heritage Assets</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	

Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D21: Enabling Development and Heritage Assets.</p> <p>This appears reasonable but needs to be applied only <u>with special justification for an historic town like Guildford.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/255
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID5: Protecting Open Space.</p>

	<p><u>We ask that this be expanded as follows “Increased protection will be sought by pursuing, where appropriate, expansion of the AONB, and designation of land as Local Green Space, Right to Roam area, and Village Green.</u></p> <p><u>Views to and from the AONB are to be protected.</u></p> <p>We ask that it is clarified that to come under the “open space” category land must be open to all members of the public, except for allotments that may need security protection.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/256</p>
<p>Respondent ID</p>	<p>8559297</p>
<p>Respondent Name</p>	<p>Holy Trinity Amenity Group (Robert Bromham)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy ID9: Retention of Public Houses</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is Sound?</p>	
<p>Do you consider this section of the document complies with the Duty to cooperate?</p>	
<p>Comment</p>	<p>Policy ID9: Retention of Public Houses</p>

	<p><u>This must be linked to a policy of not giving permission for a change of use to A4 (pub) for large premises, say more than 80sqm</u></p> <p><i>Change of use was granted to one of a the large Tunsgate units, fortunately not so far implemented. If it had been many historic pubs in the area would have been forced out of business.</i></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/257
Respondent ID	8559297
Respondent Name	Holy Trinity Amenity Group (Robert Bromham)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network</p> <p>We welcome the commitment to improve cycling facilities, but reserve comments on routes until we have studied how they will affect us. In particular a major problem is the absence of a proper cycle route to the station from our area.</p>

	<p>We strongly protest at the absence of any similar policy for walking and pedestrians and are deeply disappointed that this obvious omission, that we raised in the previous consultation, has not been rectified.</p> <p><i>Walking is the top of the government hierarchy of importance of travelling methods (cycling is second). It is the amenity that is most complained about by our members. The GBC Walking Strategy of 2004 was withdrawn without explanation or consultation and there are no plans to replace it. The Walking Forum was allowed to die due to lack of Council support. Neither GBC or SCC has any longer anybody with expertise in walking infrastructure, and nobody has any responsibility for it. This is in contrast to most LAs. If cycling infrastructure is considered to be part of the Borough Plan, then the inclusion of pedestrian infrastructure is even more important.</i></p> <p><u>We ask for a commitment by GBC to producing a policy for walking and pedestrians, including production of a new Walking Strategy, and support for infrastructure improvements that would include 20mph limits, proper pedestrianisation, pedestrian priority crossings, refuge islands for crossing places, enforcement of no parking or driving on pavements, banning of A-boards, widening of pavements, prohibiting the various actions that involve use and blockage of pavements etc.</u></p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/116</p>
<p>Respondent ID</p>	<p>17426113</p>
<p>Respondent Name</p>	<p>Home Builders Federation (Mark Behrendt)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy H8: First Homes</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is</p>	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H8: First Homes</p> <p>2. Whilst we do not have any concerns regarding the approach taken in this policy, we do have concerns regarding the approach taken to considering First Homes in the viability study. Whilst we note that the profit margin has been set at a higher level than for affordable housing, they are still below that for open market housing. Whilst we recognise that such homes are considered to be an affordable housing tenure they are marketed and sold by the developer and as such should be treated as such with regard to their risk profile and the level of profit that it is reasonable to expect. It is not justified for a lower profit margin to be used on these homes and as such the viability assessment should be updated and the full cumulative impact of this policy to be tested.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/117
Respondent ID	17426113
Respondent Name	Home Builders Federation (Mark Behrendt)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	No
Do you consider this section of the document	

complies with the Duty to cooperate?

Comment

Policy P6/P7: Biodiversity in New Developments

The policy is unsound as it is inconsistent with national policy and unjustified

3. The Council are proposing in this policy to require all development to deliver 20% net gain in biodiversity. The Council recognises in paragraph 3.46 of the Natural Environment Topic Paper the importance of ensuring alignment with the national approach to biodiversity net gain by removing exemptions that were proposed. The HBF would agree with the importance of aligning national and local policy. However, the Councils desire to align with national policy is not taken forward with regard to the 10% net gain requirements now set out in the Environment Act. The Council recognise that the policy is not consistent with legislation but consider their position is both justified. The HBF disagrees with the Council and do not consider the Council's departure from the 10% requirement in the Environment Act to be justified.

4. With regard to the need for a consistent approach across the Country the Council note that other areas are examining the possibility of delivering beyond the 10% net gain requirement set out in the Environment Act. Whilst this may be the case it does not justify the Council's position. Whilst other authorities may be considering their position the examples given have not gone through an examination in public or are supplement planning documents which, as the Council should be aware, face no examination in public and do not contain policies. In contrast the most recent consultation on Biodiversity Net Gain Regulations and Implementation sets out on page 7 the Government reiterates their intention that *"Mandating biodiversity net gain through the Environment Act will establish a consistent set of requirements and necessary exemptions which give developers clarity as to how they can meet their net gain obligations."* By setting out a minimum requirement the Government recognises the importance to all parties of consistency in such matters and the Council's decision to require a 20% net gain in biodiversity is clearly not consistent with national policy.

5. The latest consultation also reiterates the Government's view that whilst the 10% requirement is not a cap going beyond that figure should be the choice of developer to *"voluntarily go further"*. Therefore, whilst the NPPF and PPG do not specifically prohibit setting standards over and above those in the Environment Act it is clear that the intention of the Government is to set a minimum requirement but encourage where possible the developers to go further. Such an approach also recognises that until an assessment of the biodiversity on a site is undertaken it is very difficult to

assess what is required to deliver the minimum level of net gain either on- or off-site. Some sites may be able to deliver significant improvements more easily without a significant reduction in the developable area, whilst other sites may well have their capacity significantly reduced in order to achieve the minimum requirements set by Government. This uncertainty is clearly why the Government set its expectation at 10% recognising that it was a balance between delivering net gains and increasing the supply of new homes. However, we recognise that offsite delivery and offsetting are both options that would maintain the developable area of a site. However, as set out below this has not been tested by the Council in relation to their policy.

Assessment of viability

6. The Council have considered the impact of a 20% BNG on viability. The costs of implementing the 20% BNG is based on the evidence set out in the DEFRA/ Natural England impact assessment undertaken as part of the development of the 10% requirement as set out in the Environment Act. The uplift used with regard to the percentage increase on build costs is based on the central estimate within tables 19 and 20. As such the Council are assuming that 75% of all net gain is delivered onsite¹ with the remaining 25% delivered through offsite mitigation or offsetting. In making such an assumption it is therefore important to consider the amount of additional land that would be required to deliver the majority of the 20% BNG on site and the consequential impact on the amount of land available for development. There could be a significant impact on the net developable area of some sites with a consequential impact on the number of homes that a site can deliver. This will have both an impact on the viability of a site and, potentially, on the overall deliverability of the plan if sites deliver fewer homes than were expected at the examination of the part 1 local plan.

7. If the expectation is that the additional 10% BNG above the statutory minimum that is being required in this policy is to be delivered offsite than there will be a significantly higher cost than is set out in the viability study. The Government's Impact Assessment provides some indication as to the cost of delivering BNG offsite. Table 19 of the Impact Assessment shows that scenario C, which modelled all of the mandatory 10% being delivered off site would equate to 2.4% of build costs on a greenfield site compared to 0.7% under scenario B which is the basis of the Council's estimates.

8. However, these costs may be an underestimate. The evidence from the Governments market analysis² supporting the current consultation on the implementation of Biodiversity Net Gain indicates that the average price of delivering net gain offsite is higher than when set out in the impact assessment. The Impact Assessment used a price of £11,000 per biodiversity unit, but stakeholders informing the study considered that this price was too low to attract sufficient

	<p>supply to meet expected demand. A range of between £15,000 and £25,000 per biodiversity unit was considered to be more reasonable to attract sufficient providers to deliver the necessary units to meet demand.</p> <p><u>Recommendation</u></p> <p>9. The HBF would recommend that the Council remove the requirement for all qualifying development to deliver a 20% net gain in biodiversity and replaced with a policy that state the Council strongly supports development that go beyond the minimum requirements and deliver a biodiversity net gain of 20%. Such an approach would be consistent with national policy and the Government’s objectives for both net gain and housing delivery. It will also ensure that the approach taken by the Council is sufficiently flexible to allow schemes to deliver the requirements set out in legislation whilst meeting the Council’s other policies.</p>
What changes do you suggest should be made to the document?	<p>Recommendation</p> <p>9. The HBF would recommend that the Council remove the requirement for all qualifying development to deliver a 20% net gain in biodiversity and replaced with a policy that state the Council strongly supports development that go beyond the minimum requirements and deliver a biodiversity net gain of 20%. Such an approach would be consistent with national policy and the Government’s objectives for both net gain and housing delivery. It will also ensure that the approach taken by the Council is sufficiently flexible to allow schemes to deliver the requirements set out in legislation whilst meeting the Council’s other policies.</p>
Files	
Comment ID	LPDM21B/118
Respondent ID	17426113
Respondent Name	Home Builders Federation (Mark Behrendt)
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	No

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D14: Carbon Emissions from Buildings</p> <p>The policy is unsound as it repeats national policy</p> <p>10. Policy D14 proposes that all new dwellings must achieve a reduction in carbon emissions of at least 31% compared to targets in the 2013 building regulations. The HBF supports the Government's phased approach we also consider it important that this is achieved through the Building Regulations and that it is unnecessary for local plans to seek to repeat national mandatory standards. Seeking to replicate such a standard in a local plan can create confusion for decision makers and applicants as to the standard that should be applied. In this case the situation is further confused given that the proposed changes to Building Regulations now being proposed by Government would lead to a 27% reduction in CO2 on current building regulations. Given this shift to securing improvements in energy efficiency through mandatory building regulations which will be introduced in the summer of 2022 we would suggest that policy CC3 is unnecessary and should be deleted.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/119
Respondent ID	17426113
Respondent Name	Home Builders Federation (Mark Behrendt)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	No

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy ID11: Parking Standards

This policy is not legally compliant and inconsistent with national policy.

11. This policy requires non-strategic sites to meet expected standards set out in Parking SPD. However, the Council cannot set policy outside of the local plan and as such it cannot require development to accord with guidance. The relevant legislation defining Local Plans and SPDs and their status as policy documents is the Town and Country Planning Regulations (2012). In particular regulation 5(1)(a)(iv) defines a local development document as being one in which includes: “development management and site allocation policies, which are intended to guide the determination of applications for planning permission”. We would therefore suggest that if the Council wishes to set a standard with regard to parking, then this must be set out in the local plan to ensure that any changes to these standards are considered through the proper process of consultation and examination. If the Council wishes to refer to guidance, then it should be clear that development will need to take account of this guidance but not that it must accord with it.

12. With regard to electric vehicle charging points (EVCP) the Council will be aware that in November 2021 the Government set out its intentions with regard to the provision of EVCPs on new development. These include bring forward regulations to mandate from June 2022 the installation of Electric Vehicle Charging Points (EVCP) for every new home with associated parking within the site boundary and setting the expected technical standards for EVCPs. Therefore, it will not be necessary for the further standard to be set out in local plans. Whilst the Council have not set out their specific standards in the local plan it does make reference to the electric vehicle charging in points 2e and 3e of this policy. Given the Government’s intentions we would suggest both of these points are removed from the policy.

13. Secondly, if the Council requires development to meet any proposed standards will be important that full and proper consideration is given in the viability assessment as to the impact of requiring electric vehicle charging points (EVCP). The Council’s policy approach should not compromise the viability of development. The Council’s viability assessment includes an allowance £500 per dwelling. However, the evidence supporting the Government’s response to

	<p>the consultation on EVCPs estimated an installation cost of between £615 to £1,115 per EVCP for off-street parking and between £975 and £2,947 per charge point for multi-occupancy surface parking. Whilst this in itself may not seem a significant amount it is important that the actual cost of delivering this policy is included in the viability assessment to ensure the cumulative impact of all costs does not impact the deliverability of the local plan. However, the HBF and its Members also have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard.</p> <p>14. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. Therefore, an allowance for such infrastructure should be explicitly included in the Council's viability assessment.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/288
Respondent ID	15243073
Respondent Name	Iceni Projects Ltd (Stuart Mills)
Agent Name	
Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>Policy P12: Water Quality, Waterbodies and Riparian Corridors</p> <p>This policy sets out the requirements for development proposals affecting all watercourses. Specifically it states at point 5:</p> <p><i>“Development proposals are required to retain or reinstate an undeveloped buffer zone on both sides of a main river measuring a minimum of 10 metres from the top of the riverbank that is supported by a working methods statement detailing how the buffer zone will be protected during construction, and a Landscape and Ecological Management Plan detailing how it will be enhanced in the long-term”.</i></p> <p>Whilst we support the stated intention of the policy to protect and enhance main rivers, the Plan does not provide any justification or explanation as to why specifically a 10 metre figure has been identified as necessary to achieve this aim. We are not aware of any specific policy or guidance that refers to a need for 10 metres to be provided either side of a river.</p> <p>This proposed 10 metre buffer does not align with the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016. These regulations require an 8-meter buffer from the main bank of the river, stating:</p> <p><i>“You may need to apply for permission to do any of the following regulated flood risk activities: any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river.</i></p> <p>Further to this we are aware of several planning applications in Guildford Borough adjacent to the River Wey, such as Bishops Nissan of Guildford, Walnut Tree Close (LPA ref: 17/P/02469), where the Environment Agency applied an 8 metre buffer.</p> <p>Having regard to the above, we consider that a 10 metre buffer from the top of riverbank identified in policy P12 (part 5) is not justified and is not consistent with legislation. We consider that in order to ensure the policy is sound, the buffer zone set out in Policy P12 should be 8 metres.</p>
What changes do you suggest should be made	

to the document?	
Files	Guildford Bus Depot Site Location Plan.pdf
Comment ID	LPDM21B/289
Respondent ID	15243073
Respondent Name	Iceni Projects Ltd (Stuart Mills)
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D11: The Corridor of The River Wey and Godalming Navigations</p> <p>Policy D11 establishes the requirements for development proposals that impact the River Wey and Godalming Navigations and its environs. At points 2a and b it states:</p> <p><i>“Development proposals adjoining the river are expected to seek to improve visual and physical public access to and along the river by:</i></p> <p><i>a) providing direct, safe and clear public access to and along the river;</i></p> <p><i>b) providing a joined-up approach to river access, considering access and uses up and down stream, as well as across the river channel and the adjoining areas to the existing towpath”</i></p>

	<p>We support the broad aims of this policy to open up access to the river for public enjoyment and to achieve the stated aims of the policy. We would however note that such opening up on land in private ownership would be subject to the landowner's support and the feasibility and desirability of doing so, depending on the nature of the site and the development proposals. For example, some sites may be on stretches of the river where there is no obvious destination or where there are practical reasons why public access would not be desirable. In such circumstances, the requirement to open up access to the riverfront would not be reasonable or deliverable.</p> <p>In order to address these points and ensure the policy is sound, we consider that the wording should be updated as follows: "2) Development proposals adjoining the river are expected, <u>where feasible and appropriate</u>, to improve visual and physical public access to and along the river by..."</p>
What changes do you suggest should be made to the document?	
Files	Guildford Bus Depot Site Location Plan.pdf
Comment ID	LPDM21B/297
Respondent ID	8585601
Respondent Name	Jennie Kyte
Agent Name	
Section	Policy D6: Shopfront Design and Security
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>Policy D6: Shopfront Design and Security</p> <p>A planning application for all new shopfronts and changes to existing ones should be the practice for all shops in the High St, not just those which are listed. The High St is a great heritage asset to the town and all shop fronts need to be kept to a high and consistent standard for the sake of the High St, which is in the Town Conservation Area.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/295
Respondent ID	8585601
Respondent Name	Jennie Kyte
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>“In more remote locations of the Surrey Hills AONB with darker skies, development proposals that cause light pollution will be resisted”</p>

	<p>It is good that protection of the Surrey Hills from light pollution is included. However, light pollution, not just in remote areas but any part of the Surrey Hills AONB can harm both near and far views reaching into the surrounding hills, impacting on night skies and on the enjoyment of night skies.</p> <p>The night sky seen from all parts of the AONB and even from gardens bordering the AONB needs protection.</p> <p>Perhaps the above sentence written under “Dark Skies” could be more inclusive of the Surrey Hills AONB, as by referring to one part only, it implies that other parts are not protected from light pollution.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/298
Respondent ID	8585601
Respondent Name	Jennie Kyte
Agent Name	
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D15: Renewable and Low Carbon Energy Regeneration and Storage

	<p>5.246 Whilst the National Grid will not be fully decarbonised by 2030 it will be very low in carbon intensity and will be fully decarbonised in the early lifetime of any solar development.</p> <p>This sentence is therefore misleading and should be removed.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/296
Respondent ID	8585601
Respondent Name	Jennie Kyte
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID5: Protecting Open Space</p> <p>The words “Views to and from the AONB” should be added to protect such views.</p> <p>These words in the 2003 Local Plan were very helpful and much used.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/186
Respondent ID	20674913
Respondent Name	Jim Allen
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	No
Do you consider this section of the document is Sound?	No
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Draft topic paper: Parking Standards January 2022</p> <p>Overall impression of Regulation 19 submission SPD and discussion paper</p> <p><i>I note the changes within the document from Reg 18 and fundamentally disagree with these changes and arguments used to make these changes included within the topic paper.</i></p> <p>The document relies on unreliable statistics many years out of date which have been manipulated to match the argument. Using documents superseded by change of government direction or not available to the general public.</p> <p>With maximum only numbers.</p>

this leaves the developer open to supply zero parking places to any property on his development, while being forced to supply Electrical vehicle charging points to all homes an anomaly within its self. The minimum parking space of one (1) vehicle for all properties of any size must be included to allow visitors or residents to charge their Electric vehicle.

The concept of half of a car space

This is bizarre for any home would mean parking outside the curtilage of the property for both visitors and the second or third car on adjacent road side parking. With no real provision for visitors or Delivery vehicles. This 'efficient use of land' merely means 'provisions would make for ghetto estates not garden villages as promoted by the Government, in January 2017

The proposed changes are based on

“A fit able person and a public transport system which by implication is integrated at a cost which is affordable for a family of 4.” Which simply does not exist and will never exist in this country as company profit is put before public services”. As documents within, GBC proposals explicitly excludes “integrated transport” because there is no intention of ‘permitting or insisting’ that buses meet the trains at the train station, and planning permission granted on appeal, actually prevents this occurring. All buses run in isolation to other forms of long-distance transport and within services themselves are isolated. They radiate from the bus station centred on the town centre with no consideration medical facilities are not located in the town centre or providing service to outlying estates ‘due to parking congestion’ on estate roads.

These Regulation amendments take no account of:

1. The 50% of the population which do not fit the highlighted demography above.
2. Inability to utilises ‘active travel’; through age or infirmity is ignored
3. Inability to carry 20kg+ for 15 minutes continuously; the 15-minute community proposal
4. Are outside the 50 metres to a bus stop; The blue badge criteria.
5. The Lack of ‘planned’ Public transport due to direction and time of travel; An unknown factor of the general population as the question has never been asked.

This Regulation 19 documents sets out to exacerbate parking problems

Thus, the impressions and arguments within the regulation 19 documents are an agenda which simply does not fit into the lives of the existing residents of Guildford LPA as displayed by the multitude of Neighbourhood Plans which require minimum parking spaces and availability of Visitor and delivery Parking.

Breakdown of findings causing concern by Paragraph and Policy

1.4 states

The design guide applies to all sites yet needs to clarify that Neighbourhood Plans will take precedence in non-strategic sites as the Draft topic paper on parking standards January 2022 stated:

Sic: 2.6 page 3; Neighbourhood Plans may include local parking standards. As of January 2022, the adopted Neighbourhood Plans for Burpham, Effingham, Lovelace, Send and Puttenham include parking standards, and the Plans for East Horsley and West Horsley include site policies with parking elements.

Sic: 2.7 page 4; Those Plans with car parking standards set minimum standards to be applied to new residential development within these neighbourhood areas or refer to Surrey County Council's (SCC) Vehicular and Cycle Parking Guidance (2018). The approach to the inclusion of bay and garage dimensions as well as Electric Vehicle Charging Point (EVCP) and cycle standards varies between Plans. A breakdown of the elements included in each adopted or emerging Neighbourhood Plan is contained in Table 1 below.

Section 1.5

fails to identify parking for Business purposes

Policy ID 11

I welcome precedence given to parking standards in Neighbourhood Plans and have commented accordingly in the emerging policy's part 2 Please note Para 1.4 above)

Commentary:

The imposition of maximum parking standards on strategic sites and locations without Neighbourhood Plans is perverse as it is clear all populations within Neighbourhood Plan areas have had a democratic vote and agreed minimums. Thus, forcing other locations to use a maximum number is clearly an undemocratic attempt to distort the electorates wishes for the future parking requirements as they live in the real world.

Our objections to the parking SPD are based on these incontrovertible facts.

As there is no minimum and there is a legal requirement for charging points, the anomaly of a charging point with no parking place is a rational conclusion. It is worth remembering:

NPPF 108. Maximum parking standards for residential and non-residential

development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.”

As an extreme example with no Minimum, then a four-bedroom property could end with no parking places.

Surrey county Council as Highway authority states in its own guidance: *“that it is recognised that the county ‘exhibits a wide range of social and economic circumstances that necessitate a flexible approach to identifying appropriate levels of car parking provision’.*

Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (2021) not available to the public

Residential Car Parking Guidance

These documents do not correlate with those available in the public domain. The parking guidance is January 2020 and no record of the 2021 document can be found on Surrey’s Web Site.

The document paragraph 4.20 commends this guidance to Surrey Authorities but is not compulsory and in fact

strongly suggest other authorities are setting aside this county wide guidance.

Paragraph 425 of the topic paper

notes 2011 data is out of date and a strong argument of delaying the preparation of the parking SPD.

I Note Vehicle numbers have been on the increase (paragraph 40 – 42) of the topic paper show clear correlation between cars within the borough and homes within the borough strongly suggesting with 15,000 new Homes planned the equivalent number of extra parking places will be required.

4.45 of the topic paper is statistical jiggery pokery

it is guesswork at best. An as the information is clearly available in the census data – there are statistically relevant numbers within the data which shows provision of 2 per 2 bed home 3 per 3 bed home 4 per 4 bed home is the logical conclusion because if the statistics relevance is ignored then the whole numbers layout is meaningless

4.60 of the topic paper:

It is unclear why this paragraph refers to reducing trends when the trend line is directly comparable with house build rates. As previously stated above, this SPD should wait until the new census data is available.

4.62 of the topic paper

It is unclear what consultation responses received at reg 18 and volume of those responses, have justified the dramatic change of direction from Minimums to maximums. This data should be published on the council's web site for open analysis. The comment that the preferred options were overly generous using whole numbers of cars. Will now result in new private properties parking provision within curtilages having half size parking spaces, thus, logically, forcing on-road parking to match previously documented need and statistical evidence for proper off-road parking

4.67 of the topic paper

Notwithstanding our base objection of half parking spaces within this topic paper and SPD, I strongly object to

rounding down. All numbers Should be whole numbers greater than any average decimal points below that number.

4.70 of the topic paper

I Strongly disagree, that, this approach provides ‘flexibility’. in fact, it contravenes other policy’s in the NPPF and the local plan which suggest excess parking spaces when not required could be used for garden boxes etc. As this proposal severely restricts Parking availability the spare parking space reuse is irrelevant. Furthermore there is the councils long awaited Sustainable Movement Corridor SPD has not been published, it is therefore premature to make the statement that Urban areas and Strategic sites are well served by public transport, particularly given the financial difficulties of many bus operators and the only one section of the SMC so far ‘displayed’ (Wey Side Urban Village) provides transport to one location, the town centre, but is not integrated with train journeys or providing other destinations in the opposite directions. Thus, the current proposal at this site WUV will mean 1500 people needing public transport to leave the site between 06:30 and 09:30 on a daily basis into the town centre as currently there is a shortage of 1500 parking spaces under the current proposals by any calculation.

Using a flat-land Cambridge based study where cycles are part of the university psyche and is a different study than for hilly Guildford, as it is more of a Rome based city study requirement with its seven hills.

4.75 – 4.76, of the topic paper

I would highlight the ALDI site in Burpham for the Major failure to understand parking requirements at their new Store – both SCC ALDI and GBC made the claim that 77 places were sufficient. Now some five years on, the constant inability to enter the car park is causing serious traffic delays because 103 were required using the simple calculation of; expected customers, car time in store car park, number of hours open and days of the year open. This calculation proved correct – three transport ‘experts’ failed to understand this requirement ‘expecting 20% of people to simply walk to the store and carry over 20KG of groceries home is irrational and contains incoherent thought patterns.

4.79 Car Clubs *in* the topic paper

Cars are unavailable 20% of the time and it can take as long to walk to the club parking place as the journey by Taxis or keeping a personal car. They in reality are unsustainable in practice for many reasons

4.82 / 4.84 Carbon Neutral

Carbon neutral does not mean travel neutral and does not signify or indicate in any way less four wheeled boxes with a requirement to park at each end of any Journey, or, as a means of transport, but merely suggest a potential change in propulsion method.

4.83 of the topic paper refers to air quality

stating that Key Criteria set out in policy is unlikely to be met, thus suggesting that no action is required to get below criteria. Although in all cases it is unacceptable for it to deteriorate. Thus, the argument for the explicit need to 'remove cars' from the location is not made; noting this would include removing no emission ELV's. The argument is purely 'Anti car' not 'anti-pollution' like much of this 'parking paper'

4.91 I question the legal status of this requirement and suggest it cannot be enforced under law as it would be discriminatory

<https://www.gov.uk/government/news/more-parking-for-new-homes-will-end-vicious-cycle-of-clogged-up-streets>

See Appendix 2

POLICY ID11: Parking Standards Summary of basic comments

1) The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, should there be conflict, except in relation to strategic sites. *[Agree]*

2) For strategic sites:

a) the provision of residential car parking, for use by residents themselves, will not exceed the maximum standards set out in Table B1; *[Disagree Maximum restriction, but no minimum]*

b) the provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2

spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated; *[disagree over complex and 0.2 simply wrong]*

c) the provision of non-residential car parking will not exceed the maximum standards set out in Table B2; *[disagree]*

d) the provision of electric vehicle charging will provide at least the minimum requirements set out in the Parking SPD; and *[fails to realise no minimum means in reality a charging point but no parking place]*

e) the provision of cycle parking will provide at least the minimum requirements set out in Table B3. *[agreed]*

3) For non-strategic sites:

a) the provision of car parking in new residential development in Guildford town centre or suburban areas, for use by residents themselves, will not exceed the maximum standards set out in the Parking SPD; *[contradicts inclusion of Neighbourhood Plan requirements thus undemocratic imposition of maximums on non-Neighbourhood Plan areas]*

b) the provision of car parking in new residential development in village and rural areas, for use by residents themselves, should meet the expected standards set out in the Parking SPD; *[can be used to usurp Neighbourhood Plans also should /shall/]*

c) the provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated; *[disagree; complex making no provision for inside curtilage or in the public realm and 0.2 inadequate]*

d) the provision of non-residential car parking will not exceed the maximum standards set out in the Parking SPD; *[disagree with maximum should be a minimum]*

e) the provision of electric vehicle charging will provide at least the minimum requirements set out in the Parking SPD; and *[agreed; noting the no- provision of parking spaces permitted]*

f) the provision of cycle parking will provide at least the minimum requirements set out in the Parking SPD. *[Agreed]*

4) For residential and non-residential development on strategic sites and also non-strategic sites in urban areas:

a) the provision of car and motorised vehicle parking at lower than the defined maximum standards must be justified by a coherent package of sustainable transport measures which will be proportionate to the level of reduction sought. Evidence will be expected to address: *[disagree as 'sustainable transport is neither identified in scheduling or in routes or costing per mile. Currently inadequate with no sign of improvement]*

- i. generous provision of unallocated car parking as a proportion of all car parking spaces provided by the development proposal, where this enables more efficient use of land; *[agreed]*
- ii. excellent quality of walking and cycling access to a local centre, district centre or Guildford town centre; *[this is not relevant to a parking standard it is part of an anti car agenda]*
- iii. high public transport accessibility; and
- iv. planning obligations and/or on-street parking controls such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. *[Disagree – see commentary]*

b) the provision of car-free development must be justified by a coherent package of sustainable transport measures. Evidence will be required to demonstrate: *[disagree with 'car-free developments' as a concept save in the town centre]*

- i. excellent quality of walking and cycling access to a district centre or Guildford town centre; *[disagree as this excludes 50% of residents]*
- ii. high public transport accessibility; *[simply won't happen GBC are anti Integrated Public transport plus local bus company has removed its self from the Town due to financial problems]*
- iii. access to a car club for residents and/or users; *[Disagree – the concept is fatally flawed as it fails to provide regular journey to work]*
- iv. that the car-free status of the development can be enforced by planning obligations and/or on-street parking controls; *[Disagree car free status should be town centre only]*
- v. appropriate incentivisation of these measures; and *[Disagree as these are never in perpetuity]*
- vi. appropriate monitoring of these measures. *[no point in monitoring if the information does not result in change back if the proposals fail]*

5) For all sites:

a) car parking spaces external to a dwelling will be required to meet the minimum size requirements of 5 by 2.5 metres; *[Agree]*

b) a garage will only count as providing a car parking space if it meets the minimum internal dimensions of 6 by 3 metres. A garage with the minimum internal dimensions of 7 by 3.3 metres will be considered to also have the capacity to park up to 2 cycles, allowing independent access. *[Agree]*

A garage with the minimum internal dimensions of 7 by 4 metres will be considered to have the capacity to park up to 5 cycles, allowing independent access. Alternate layouts for garages which can be demonstrated to provide equivalent or better space provision and access for a vehicle and cycles may be acceptable; *[Agree]*

c) car parking spaces for disabled drivers will be designed and provided in accordance with national guidance; *[Agreed]*

d) development proposals will be required to demonstrate that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. *[Disagree as previous requirements of under supply of parking spaces means 'no option but park on the roads]*

Appendix 1

Other evidence and commentary

Inequalities in Mobility and Access in the UK Transport System 3

Executive Summary

This study provides a rapid desk-based review of the evidence on the equity and inclusion outcomes of technological, behavioural and policy innovations in the UK transport system to 2040. The report takes as its building block the report from the Social Exclusion Unit (SEU) (2003), which first identified the important links between unequal mobility and inability to access jobs, education, training, healthcare, affordable food and leisure opportunities in the

UK. The review has involved: i) A review of the published literatures from 2002-2018 pertaining to

a) current transport and accessibility inequalities in the UK and

b) scenarios that consider potential future inequalities arising from the uptake of new mobility technologies and future transport systems.

ii) Basic trend analysis of relevant national survey datasets to identify current distributions of travel by income, age, gender and disability, and the accessibility outcomes of these distributions.

iii) Qualitative evaluation of the likely impacts of different future scenarios on the distributions of mobility and accessibility in the UK to 2040 based on a workshop with researchers at the Institute for Transport Studies at the University of Leeds.

iv) Recommendations about the potential for greater social inclusion within the UK transport system, based on evidence of good practices from elsewhere. Our review has identified that the published academic and policy evidence for this specific topic is quite sparse. Much of the future scenario and visioning work that was reviewed for this report does not explicitly consider the consequences of future transport innovations on current inequalities. This a serious problem because the review shows that many people in the UK may not be able to access important local services and activities, such as jobs, learning, healthcare, food shopping or leisure as a result of a lack of adequate transport provision. Problems with transport and poor links to opportunity destinations can also contribute to social isolation, by preventing full participation in these life-enhancing opportunities. The worst effects of road traffic can also lead to reduced quality of life due to high levels of exposure to pedestrian casualties and fatalities, and traffic-related air and noise pollution, especially in dense urban areas. As such, I recommend that more evidence and dedicated research is urgently needed to assess the differential impacts of new and emerging transport technologies and innovations across different social groups and places. Based on the evidence I have reviewed; I recommend that carefully designed policy interventions are needed to ensure that the current inequalities in mobility and accessibility do not deepen and widen.

“As this will do by denying low-cost homes to be devoid of parking places. I should be raising base lines not allowing them to taken down to the lowest common denominator of lack of facilities.”

Taken from the government report on access and inequalities

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf

Quote: “The quickest way to make a city centre die is to stop people getting in there,” says Hugh Bladen of the Association for British Drivers. Britain’s declining high streets won’t be helped by restrictions on driving, he argues, “otherwise town centres just get full of druggies and drunks”. He acknowledges that “some towns and cities get clogged up but that’s just because of poor planning; they should have better parking options”.

<https://www.building.co.uk/buildings/parking-problems-on-housing-developments/5066454.article>

Residents in housing developments built from 2007 onwards were asked about their level of satisfaction with their estates, over 400 of which were analysed. While up to 80% of residents were generally happy with the character and design of their surroundings, a whopping 75% identified parking as an issue they were unhappy or very unhappy with.

The Space to Park report concludes that the answer to current parking problems will require a broad range of solutions. These include more legible and permeable estate design, wider carriageways to accommodate on-street parking, greater deployment of unallocated spaces and a general cultural acceptance that reducing suburban residential parking provision should no longer be considered a viable strategy for minimising car use across society as a whole.

<https://www.gov.uk/government/news/more-parking-for-new-homes-will-end-vicious-cycle-of-clogged-up-streets>

The Secretary of State was clear that new developments should be built with sufficient parking that reflects local market demand.

Eric Pickles, said:

Families want a home with space for children to play in the garden and somewhere to park and load the car or cars. The consequences of not building this are there for all to see: more cars left on the kerb, more cars parked in the streets, more municipal parking restrictions and more parking tickets.

No space at home leaves no space on the road. We need to cease this vicious cycle that leaves our streets endlessly clogged up. Allowing the market to offer enough parking spaces will help take the pressure off our congested roads.

Appendix 2 re Item 4.91

24 May 2017 Publication

The recent Court of Appeal (CoA) case of *R (Khodari) v Royal Borough of Kensington and Chelsea Council and another* [2017] EWCA Civ 333 (*Khodari*) will affect the ability of local authorities to preclude occupiers of a development from applying for permits to park on the public highway.

In the *Khodari* case Mr and Mrs Khodari were leaseholders of one of five existing flats in a building at Egerton Gardens. In March 2015, the Royal Borough of Kensington and Chelsea Council (the Council) granted a developer planning permission to convert the building into eight flats. The Council's development plan stated that due to pressure on parking that Section 106 agreements would have to include obligations that all new residential development should be permit free. The Council therefore required the three additional flats to be subject to that obligation.

The developer entered into an agreement with the Council covenanting:

not to apply for parking permits for the additional flats, nor knowingly permit any owner or occupier of the additional flats to do so; and to surrender any permit issued for those flats;

to notify prospective owners or occupiers of the additional flats that they would not be entitled to apply for parking permits; and

to include a covenant in any lease of the additional flats preventing the lessee from applying for a parking permit and entitling the Council to enforce that obligation as a third party.

The agreement was expressed to be made under statutory powers including Section 106 of the Town and Country Planning Act 1990 (1990 Act) and Section 16 of the Greater London Council General Powers Act 1974 (GLCGPA 1974).

This was all of interest to Mr and Mrs Khodari as their lease could be terminated under a redevelopment break clause. They challenged the grant of planning permission on a couple of grounds including that the imposition of the parking

permit obligation was unlawful and outside the Council’s statutory powers. The High Court agreed with this second ground of challenge and quashed the planning permission. The reasoning was that the obligation did not fall within the scope of Section 106 (3) (enforceable against the person entering into the agreement and their successors) and (5) (enforceable by injunction) of the 1990 Act and was therefore not a planning obligation.

The Council appealed to the Court of Appeal. The CoA agreed with the High Court that the parking permit obligation was not a planning obligation under Section 106 of the 1990 Act, as Section 106 is concerned with “the land” in which a person has a legal interest. That “land” may be different to that covered by the planning permission, providing the “land” and the land that the planning permission relates to are directly related.

In the *Khodari* case, the developer only had a legal interest in the building in which the flats would be created, not the highway in relation to which the parking permit obligation related. The Council was trying to prevent the use of the highway for parking rather than restrict the use of a flat or the building. As applying for a parking permit was not a use of the building it could not be dealt with through a Section 106 agreement. The CoA confirmed that Section 106 of the 1990 Act requires the obligation to restrict the use of the land which is bound by it and in which the person entering into the agreement has a legal interest.

Despite the above, the agreement had also been made under Section 16 of the GLCGPA 1974 which required the agreement to be made “in connection with the land”. It did not have to regulate the use of the land itself and the phrase “in connection with” had a wide meaning. The CoA concluded that there was a connection between the use of the additional flats and the potential grant of additional parking permits, not least because residence was a qualification for a parking permit. There was therefore a sufficient connection between the obligation and the development.

Comment

The implication of the *Khodari* case is that local authorities in Greater London may continue to have the ability to impose parking permit obligations, but local authorities outside of Greater London will be left without that power. There may be other mechanisms by which local authorities could achieve the same outcome including excluding new properties from the schedule of streets in the relevant statutory instrument creating a Controlled Parking Zone. Some have also suggested that it may be possible to re-word obligations to read along the lines of a restriction on occupation such as “the residential units are not to be occupied by any person who holds a parking permit”. The lawfulness of such an obligation, and the appetite of a local planning authority to enforce it are doubtful

	<p><u>though.</u></p> <p><u>The <i>Khodari</i> case also raises the prospect that parking permit obligations in existing Section 106 agreements which are similar to those in the <i>Khodari</i> case will no longer be enforceable.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/125
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy H7: Review Mechanisms</u></p> <p>2.1 We recognise that, where it is demonstrated to be unviable to provide an affordable housing contribution in line with Policy H2, a viability review mechanism can be appropriate. However, such a mechanism may not always be appropriate, as recognised in paragraph 2.33 of the supporting text, and so we recommend that use of a review</p>

mechanism should be considered on a case by case basis. As such, we welcome the inclusion in 1) of the reference to GBC only requiring such a mechanism to be secured 'where it considers appropriate'. As paragraph 2.33 notes, circumstances where a review mechanism may not be appropriate could include, amongst other scenarios, smaller scale development where the likelihood of an increased contribution is minimal.

2.2 We also welcome confirmation that any further contributions secured via the review mechanism will be capped at the extent of additional contribution necessary to meet the minimum requirement set out in Policy H2. This is essential to ensure that contributions requested do not exceed policy requirements.

2.3 For clarity and consistency with the PPG, we recommend that further details on the approach to calculating any additional contributions should be set out within Policy H7 or the supporting text. PPG paragraph 10-009-20190509 sets out that Plans should set out clear process and terms of engagement regarding how and when viability will be reassessed. For example, we recommend that it is specified that the review will be based on a comparison between an updated viability appraisal (using the same methodology as that agreed as part of the application) and the appraisal completed as part of the application to identify whether the viability of the development has improved and if it is reasonable to require any additional contributions towards affordable housing provision. The use of the same methodology is necessary if an accurate comparison is to be undertaken.

2.4 It is vital that the formula for calculating any additional contribution takes into account any deficit at the time of the initial viability appraisal. Taking account of the uplift in value and uplift in development costs only could result in a development being required to pay a contribution before the scheme has reached a viable position.

2.5 To ensure that the formula used is robust, consistent with national policy and guidance and sound, it should be included within the draft Plan and subject to consultation and examination. As a minimum, the principles informing the approach to calculating any uplift and inputs to the formula should be specified within the Plan.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/126

Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy H8: First Homes</u></p> <p>2.6 Martin Grant Homes supports the principle of providing discounted market housing to help first time buyers access home ownership.</p> <p>2.7 For clarity, we recommend that further details are provided within the supporting text for Policy H8 relating to the tenure split likely to be sought, taking account of First Homes as well as other forms of affordable housing. This should provide an update on the split set out within Policy H2. To ensure that suitable and viable proposals are delivered, it may be necessary in some circumstances for an alternative tenure mix to be provided and so Policy H8 should include flexibility regarding tenure split and not seek to impose a specific requirement on all sites regardless of context.</p> <p>2.8 We note that local eligibility criteria are proposed, as set out in paragraph 2.52 of the supporting text. The proposal for local eligibility criteria to fall away after the first three months of marketing is welcomed to ensure that as wide a consumer base as possible is reached. In the event that there is evidence of low uptake from people who fulfil these criteria, they should be applied flexibly to developments, for example by reducing the timescales for which they apply, so as not to constrain the delivery of new housing.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/127
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy P6/P7: Biodiversity in New Developments</u></p> <p>3.1 We recognise that GBC are seeking to maximise biodiversity enhancements in the Borough. However, there is a risk that Policy P6/P7 as drafted will have unintended consequences and limit the deliverability of much needed development in the Borough. Part 1) advises development proposals that are ‘required to seek maximum biodiversity gain’; this could be interpreted as meaning biodiversity is to be prioritised above all else, potentially inhibiting the delivery of homes allocated on sites for such development. As such, the policy should be amended to encourage maximum biodiversity gain within the context of what is feasible and appropriate on a given site should be provided. This would be consistent with the supporting text provided at paragraphs 4.16-4.18. Therefore, the recommended amendment is as follows:</p> <p>Development proposals, including those exempt from minimum biodiversity net gain standards, are required to</p>

~~seek maximum biodiversity gain and to follow the mitigation hierarchy~~ **and provide for the maximum feasible biodiversity gain.**

3.2 Part 6) sets out that tree canopies are expected to be retained. Whilst tree retention is supported in principle, there may be circumstances where the removal of some trees is necessary, for example to enable access to a site or where trees are dying and potentially dangerous. To this end, Policy P6/7 should seek retention of tree canopies where possible.

3.3 In relation to Part 8) it will be important that features on/in building structures are appropriate to the context, as paragraph 4.36 of the supporting text notes. Appropriate features are likely to differ on a site by site basis and should therefore be informed by ecology surveys to establish which species are present on a site and what the site could feasibly offer.

3.4 Part 9) states that development sites and built features are expected to be permeable for wildlife. It is recommended that this is amended to remove reference to built features as the focus of the policy should be on sites as a whole rather than individual buildings, which it is not reasonable or appropriate to expect to be permeable for wildlife.

3.5 Amendments are sought to Part 11) relating to promoting ‘a sense of community ownership of green spaces and habitats’. The principle of this is understood, however measures to promote a sense of community ownership are not defined and the policy is therefore unlikely to be effective. Moreover, it may not always be appropriate for all green spaces/habitats to be perceived as community owned, for example where they are being protected so as to protect a particular species. As such, we recommend that Part 11) is amended to encourage, rather than require, the provision of measures to promote a sense of community ownership of green spaces and habitats, where appropriate. Recommended wording is provided below:

~~Major development proposals are expected, and minor development proposals are encouraged,~~ **to deliver measures that promote a sense of community ownership of green spaces and habitats where appropriate.**

3.6 With regard to Part 12) the Environmental Bill, which seeks a 10% biodiversity net gain on all new developments, was enacted in 2021. Although yet to become a mandatory requirement, until such time as secondary legislation is introduced, any new policies should therefore be mindful of and consistent with this requirement. As such, we

	<p>consider that Policy P6/7 should require only 10% net gain, to be in line with national policy.</p> <p>3.7 We do not accept that GBC’s position is sufficiently unique to justify a requirement greater than the proposed national standard of 10% (i.e. GBC’s proposed 20%) within local planning policy. No evidence is provided to validate the comment in paragraph 4.44 that ‘Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole’ nor to demonstrate why imposing a higher requirement than envisaged in the Environment Act ‘provides greater certainty that a genuine net gain will be achieved’ as paragraph 4.44 alleges. The policy as drafted is therefore not justified and not sound. It should instead require a 10% net gain, in accordance with incoming national requirements, unless any alternative nationally prescribed standard is created. Reference to a 20% biodiversity net gain should therefore be deleted.</p> <p>3.8 We agree that as set out in Part 14) biodiversity gains that provide the best biodiversity value should be sought. These should be identified based on what is appropriate and feasible for a given site as well as taking into account wider priorities across the Borough.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/128
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy P8/P9: Protecting Important Habitats and Species</u></p> <p>3.9 Part 2) relating to 'Irreplaceable habitats' repeats content set out in paragraph 180 of the NPPF. In line with paragraph 16(f) of the NPPF, this text should be removed so as to avoid unnecessary duplication. The inclusion of the text within policy P8/P9 provides no additional merit or commentary over and above than what is contained within the NPPF. Instead, it is suggested that Policy P8/P9 should set out that irreplaceable habitats will be assessed in line with current NPPF guidance.</p> <p>3.10 In respect of Part 5), as set out in response to Policy P6/P7 above, we support the principle of retaining existing trees where feasible and appropriate. In this regard, expecting trees to be incorporated into development proposals regardless of their quality and purely because they fall within the vaguely defined category of 'significant trees' is not sound. The definition provided at paragraph 4.59 takes no account of the quality of trees and includes several subjective categories which mean there is potential for considerable debate as to whether a tree is 'significant'. Tree retention should be informed by the findings of an arboricultural report to ensure quality considerations are also factored into design and decision making.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/129
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy P10: Land Affected by Contamination
Do you consider this section of the document is	

Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy P10: Land Affected by Contamination</u></p> <p>3.11 To be sound, Part 4) should acknowledge that in some circumstances it may not be possible to provide detailed assessed of contamination risks to inform initial decision making and that it may be appropriate in such circumstances to secure the provision of additional information by planning condition. Such an approach would provide certainty that appropriate work will be undertaken to identify, and where necessary remediated, contamination without unduly prohibiting development. Part 4) should therefore be amended as follows:</p> <p><u>Where insufficient information is provided and it is not possible to secure the provision of further information by condition, or the relevant reports indicate that there will be an unacceptable adverse impact on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated through appropriate remedial measures, the planning application will be refused.</u></p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/130
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy P13: Sustainable Surface Water Management

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy P13: Sustainable Surface Water Management</u></p> <p>3.12 We understand the principle of seeking drainage schemes which intercept as much rainwater and runoff as possible. To be effective, it is important that in decision-making this is considered in the context of what it is feasible to intercept on a given site, taking account of factors such as ground conditions. We recommend that the policy is amended to reflect this.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/131
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness

4.1 We support the proposed policy approach in principle. We consider it to be sensible in terms of achieving good quality design and broadly consistent with the principles set out in Chapter 12 of the NPPF. The approach to developing the emerging proposals for Gosden Hill is considered to be consistent with Policy D4.

4.2 We agree that the characteristics of well-designed places set out in the National Design Guide should be achieved in development, to the extent to which they are relevant to a given proposal. Some characteristics may apply only to certain scales or types of development and so the requirement to demonstrate they have been achieved should be applied flexibly. The wording is therefore recommended to be amended as follows:

Development proposals are required to demonstrate how they will achieve the ten characteristics of well-designed places as set out in the National Design Guide, where applicable.

4.3 Policy D4 should acknowledge that the amount of detail in terms of design will need to be appropriate to the type of planning application. For example, national guidance identifies that an outline planning application is required only to provide information about the proposed use or uses, and the amount of development proposed for each use, to allow consideration of the application (PPG paragraph 14-034-20140306), and as such will provide a higher level of information and will not cover detailed aspects of design.

4.4 Following the deletion of Policy H4, we welcome the inclusion of density within Policy D4. Paragraph 130 of the NPPF sets out that developments should be 'sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)'. To be consistent with this, Policy D4 should allow for development which may be intentionally trying to create a new character through the use of higher densities, subject to this not having a significant adverse impact on the surrounding area.

What changes do you suggest should be made to the document?

Files	
Comment ID	LPDM21B/132
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D5: Protection of Amenity and Provision of Amenity Space</u></p> <p>4.5 We support the principle of providing of high-quality amenity space, in an appropriate form, for all dwellings. In this context, amenity provision should be informed by the location, nature and size of a development. This is vital to ensure that usable and attractive open space is provided. For example, in some circumstances it may be appropriate to provide an attractive communal garden rather than balconies which may not be attractive to use due to noise from neighbouring uses or the orientation of the building. Paragraph 5.30 acknowledges that this may be case. Against this background, we recommend that the policy should set out that ‘new build residential development proposals are expected to provide access to private or communal outdoor amenity space, where appropriate’.</p> <p>4.6 In the context of the above, we recommend the design of balconies, gardens and communal open spaces is considered on a case by case basis. We agree that, as set out in paragraphs 5.31-32 of the supporting text, outdoor space should be designed to maximise its usage and functionality and that balconies should form an attractive part of a building. However, to ensure this can be achieved, policy should avoid imposing an unjustified space requirement. We</p>

	would therefore suggest that, if considered necessary, guidance on balcony size is provided within the supporting text.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/133
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D5a: External Servicing Features and Stores
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D5a: External Servicing Features and Stores</u></p> <p>4.7 We support the proposed policy and agree that providing the necessary level and quality of cycling parking and electric charging provision will support modal shift, including at Gosden Hill.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/134
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D6: Shopfront Design and Security
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D6: Shopfront Design and Security</u></p> <p>4.8 Martin Grant Homes supports the proposed policy approach in principle. However, it is not justified that shopfronts are expected to present an active frontage to the street scene ‘at all times’. This requirement is excessive as some shops may require shutters for security reasons when closed and therefore will not have an active frontage. We therefore recommend the below wording as follows:</p> <p>‘Shopfronts are expected to present an active frontage to the street scene <u>during opening hours</u> at all times and ensure access for all.’</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/135
Respondent ID	8944737

Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D12: Sustainable and Low Impact Development</u></p> <p>4.9 Part 4) relating to ‘Energy improvements’ sets out that improvements to existing buildings to a level significantly better than current standards for new buildings is encouraged. In our view, having regard to the potential challenges of retrofitting buildings, improvements which bring existing buildings in line with the standards stated in Policy D14 or at a national level, or as close to these standards as possible, should also be encouraged as this could have a marked impact on carbon emissions. As such, we recommend Part 4) is amended as follows:</p> <p>Development proposals that will improve the energy efficiency and carbon emission rate of existing buildings to a level significantly better than the Council’s adopted standards or national standards for new buildings, whichever is most challenging, are encouraged.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/136
Respondent ID	8944737

Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D14: Carbon Emissions from Buildings</u></p> <p>4.10 We note that the standards proposed in Part 4) are taken from the forthcoming changes to Building Regulations, as noted in paragraph 5.240 of the supporting text. To ensure consistency with adopted Building Regulations, which may be subject to change over time, we suggest that Policy D14 sets out that ‘new buildings must achieve a reduction in carbon emissions in line with the standards set out in current Building Regulations’.</p> <p>4.11 To provide clarity, we recommend that the SAP assessment methodology and carbon emission factors to be used in assessing reductions in carbon emissions should be specified within the policy or supporting text.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/137
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)

Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D16: Designated Heritage Assets</u></p> <p>4.12 We note that the introduction to Historic Environment section of the consultation document is very much focused on designated heritage assets. The NPPF is clear that all heritage assets are important and should be conserved in a manner appropriate to their significance. This should be made clear within the Development Management Policies document.</p> <p>4.13 Policy D16 reflects the threads of the NPPF with regard to the requirements for applicants to provide sufficient and proportionate detail in support of their applications.</p> <p>4.14 As a general point, we propose that Policies D17, D18, D19 and D19a could be combined into one overarching ‘Designated Heritage Assets Policy’ as the principles set out in the NPPF are the same regardless of the type of asset.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/138
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)

Section	Policy D17: Listed Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D17: Listed Buildings</u></p> <p>4.15 We consider that the preferred policy approach broadly reflects the principles set out in national legislation and guidance and that the wording should therefore be aligned to these.</p> <p>4.16 In this regard, we are concerned that Policy D17 is seeking to be overly prescriptive. Listing is not intended to prevent all future works and alterations to buildings and structures, and there needs to be a degree of flexibility within policy to allow these buildings to be adapted in an appropriate manner should the need arise. The NPPF and Historic England Guidance acknowledges that where harm occurs this should be minimised and clearly justified. Some buildings can accommodate considerable alteration; it is therefore the harm to significance that should be considered. In this regard, Planning Practice Guidance is clear that “it is the degree of harm to the assets significance rather than the scale of the development that is to be assessed” (Paragraph 018 Ref ID: 18a-018-20190723).</p> <p>4.17 Taking account of the above, we recommend that the policy is drafted to be fully in accordance with relevant legislative tests and the NPPF.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/139
Respondent ID	8944737

Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D19: Scheduled Monuments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D19: Scheduled Monuments</u></p> <p>4.18 We welcome the simplifying of Policy D19 to reflect the principles set out in the NPPF. However, as discussed above, we propose that Policies D17, D18, D19 and D1Pa be combined into one overarching ‘Designated Heritage Assets Policy’ as the principles set out in the NPPF are the same regardless of the type of asset.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/140
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D19a: Registered Parks and Gardens
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D19a: Historic Parks and Gardens</u></p> <p>4.19 We welcome the inclusion of specific reference to Historic Parks and Gardens. However, the policy wording should not be more prescriptive than the NPPF to ensure that it is consistent with national policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/141
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy D20: Non-designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

<p>Comment</p>	<p><u>Policy D20: Non-Designated Heritage Assets</u></p> <p>4.20 We consider that the proposed policy reflects the principles of the NPPF, noting that the NPPF’s requirement that applicants to provide sufficient and proportionate detail in support of their applications applies to all designated and non-designated heritage assets.</p> <p>4.21 We also support the clear identification of what will constitute a non-designated heritage asset.</p> <p>4.22 The policy should reflect the exact wording of the NPPF and not be overly prescriptive. Part 3) should therefore be amended to reflect paragraph 203 of the NPPF which emphasises that a balanced judgement, considering benefits of development and harm, should be made in determining applications. Paragraph 203 states:</p> <p>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</p> <p>4.23 For ease of reference and to be clear what the policy relates to, we consider that it may be helpful to amend the policy title to also refer to archaeology.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/142</p>
<p>Respondent ID</p>	<p>8944737</p>
<p>Respondent Name</p>	<p>Martin Grant Homes</p>
<p>Agent Name</p>	<p>Barton Willmore LLP (Ms Emily Ford)</p>
<p>Section</p>	<p>Policy D21: Enabling Development and Heritage Assets</p>

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D21: Enabling Development and Heritage Assets</u></p> <p>4.24 We welcome the inclusion of separate policy to cover enabling development. Part 3) should reflect the exact wording of paragraph 208 of the NPPF which states:</p> <p>Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/143
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy ID6: Open Space in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>5.1 With regard to the accessibility standards for the open space typologies, we welcome the amendment to ‘expected maximum’ distances within Table ID6a rather than absolute maximums. Following ridged accessibility standards can compromise the layout and design of certain schemes and not always take into consideration the best areas within a site for certain typologies. In this context, we recommend the final sentence of Part 1) should state:</p> <p>New open space is expected to meet the access standards in Table ID6a <u>where possible and appropriate.</u></p> <p>5.2 Taking account of this, Part 3) relating to financial contributions should be applied flexibly to reflect where open spaces are provided albeit a slightly further distance from new homes.</p> <p>5.3 In relation to Part 5), the principle of seeking community use of privately owned pitches is supported. However, in some cases, community use may not be appropriate, or may only be appropriate at limited times, for example if there are particular security arrangements in place to protect school students. As such, the requirement should be applied flexibly depending on individual circumstances.</p> <p>5.4 We support the intention to seek open spaces which are multi-functional so that multiple benefits can be achieved. However, it should be acknowledged that not all open spaces may be able to deliver multiple functions or all of the identified benefits. In this regard, while the principle is supported, we recommend that Policy ID6, where appropriate, seeks open spaces to have multiple potential functions.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/144
Respondent ID	8944737

Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy ID8: Community Facilities
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy ID8: Community Facilities</u></p> <p>5.5 We consider that the proposed policy approach is broadly in line with NPPF paragraph 93 which seeks positive planning for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments.</p> <p>5.6 Policy A25 allocates Gosden Hill for mixed-use development including approximately 500sqm of community uses (Use Class D1) in a new Local Centre alongside retail uses (Use Classes A1-A5). The co-location of these uses and compatible uses such as residential development in a Local Centre in a central and well-connected part of the site is proposed as part of the emerging proposals. As a result of the centre's location, easy access for all residents will be provided, helping to maintain the viability of the centre.</p> <p>5.7 In this context, we support the proposed policy approach and consider that development at Gosden Hill will be consistent with the policy approach.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/145
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network</u></p> <p>5.8 We broadly agree with the principle of using both the Guildford Borough Council and Surrey County Council cycling network plans. Showing a denser network of cycling routes provides the best prospect to maximise cycling opportunities across the borough and to help achieve a meaningful modal shift away from the private car.</p> <p>5.9 We acknowledge that a potential disadvantage of this method is that a denser network will involve greater expenditure to realise. As such, we suggest that a ‘priority list’ of routes is created, which gives preference to routes which are deliverable and most likely to be effective at creating a modal shift, so that funding towards these routes is prioritised.</p> <p>5.10 Furthermore, it is apparent that delivering a comprehensive and denser network of pedestrian and cycle routes which would assist in achieving a meaningful modal shift away from the private car, is only likely to be deliverable at the expense of road space currently occupied by private cars and, as such, pragmatism is required when considering the delivery of new developments where there may be an element of reducing road capacity to deliver cycle schemes.</p> <p>5.11 With regard to the delivery of improvements as part of development proposals, whilst it is agreed that new</p>

	<p>developments should make reference to the proposed policy maps and enhance cycling where possible within their site, they should not be required to deliver new routes which are outside of their land control.</p> <p>5.12 For example, there is a suggested greenway shown along the southern boundary of the Gosden Hill development site in the Surrey CC Guildford Local Cycling Plan Map (included at Appendix A) providing a link towards West Clandon. Whilst land could be provided within the Gosden Hill site to deliver part of this route as part to addressing the requirements of Policy ID3 ‘Sustainable transport for new developments’, the developer should not be required to deliver the whole route or any part of the route outside of their land control which may lead to potential ransom issues.</p> <p>5.13 In this context, we suggest any proposed routes within Appendix A are caveated with the word ‘indicative’. This will allow for greater flexibility in providing these routes should the drawn routes not be possible due to land ownership or design constraints.</p> <p>5.14 Any future policy should also consider the rise in e-bikes which will increase the distance people are willing to travel and infrastructure for charging e-bikes should be considered in key locations.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/146
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy ID11: Parking Standards

5.15 As a general point, we note that in addition to Policy ID11, a Parking SPD is being prepared which will provide guidance on parking provision. As drafted, for strategic sites some requirements are set out in ID11 and the supporting appendices while other are detailed in the draft SPD. For clarity and to ensure the policy is effective, we recommend that all information is provided within the policy. In this context, the need for an SPD is unclear.

5.16 We agree with the proposed approach to provide separate car parking standards for non-strategic and strategic development sites. For strategic sites, the maximum car parking standards are supported but importantly the promotion of an evidence led approach to parking quantum is considered fundamental to supporting sustainable trip patterns. Where this is demonstratable, a lower provision should be considered acceptable.

5.17 For example, Gosden Hill will benefit from and provide excellent sustainable transport opportunities along key rail, public transport and cycling and walking corridors. This will reduce dependency on private car trips and would be reinforceable with parking provision below the maximum standards.

5.18 In this regard, we welcome the inclusion of the policy text relating to the provision of car parking at lower than the defined maximum standards where evidence is provided to demonstrate that the proposed provision is sustainable, adequate and will not have a detrimental impact on the local highway network, thus complying with local and national planning policy.

5.19 We recommend that policy also takes account of the changing trends in car ownership and use, particularly where developments are planned to be built out over a long time period i.e. 10 years+. The standards should allow for innovative solutions to delivering parking, which could allow for land to be repurposed should parking demand fall in the medium to long term.

5.20 We welcome the clarification of the quantum of unallocated parking sought as part of development.

	<p>5.21 We broadly agree with Part 5a) which notes the minimum dimensions of car parking spaces which have increased to 2.5 metres by 5 metres.</p> <p>5.22 We broadly agree with the cycle parking standards set out in Table B3 but note this includes a split for both long and short stay across many land use categories. Whilst the type and placement of cycle parking may vary depending on duration it is recommended that a flexible approach is taken on the type of provision required.</p> <p>5.23 Appendix C of the draft SPD sets out minimum Electric Vehicle Charging requirements. The standards are broadly supported and the flexibility offered in term of enabling infrastructure is considered pragmatic.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/394
Respondent ID	8944737
Respondent Name	Martin Grant Homes
Agent Name	Barton Willmore LLP (Ms Emily Ford)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	[A response to the draft Parking SPD consultation which covers policy matters] Flexibility regarding garage layout to accommodate cycle parking should extend further to capture the potential of standalone provision within property curtilage.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/194
Respondent ID	8825057
Respondent Name	Merrow Residents' Association (Mr Keith Meldrum)
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D11: The Corridor and The River Wey & Godalming Navigations Further to our comments on building heights we consider that policy D11, The Corridor and The River Wey & Godalming Navigations, should be amended to specifically limit building heights so that they comply not only with the above limitation but also restrict building heights to maintain the historic character of this waterway.

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/195
Respondent ID	8825057
Respondent Name	Merrow Residents' Association (Mr Keith Meldrum)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID10: Comprehensive Guildford Borough Cycle Network</p> <p>We are surprised that a Sustainable Movement Corridor (SMC) is marked on figure 2 of this policy that runs along the Epsom Road through Merrow towards the Clandon Cross Roads. So far as we are aware this is the first time that this route has been described as an SMC and so far as we are aware there has been no consultation on describing this route in this way. We find it disappointing that this revelation has been hidden in this consultation. We are aware that there has been some suggestion that the SMC in Gosden Hill Farm might pass through Park Lane into Merrow but that is another matter.</p> <p>We urge GBC to produce a specific policy on the SMCs in the Borough on which there could then be a useful and constructive dialogue. This is a suggestion that we have put to a number of Borough Councillors on a number of occasions in the last few months.</p>

	<p>We are also concerned to note that the SMC is defined as a corridor serving Blackwell Farm, the Weyside Urban Village and Gosden Hill Farm- there is no mention of the SMC in Merrow. That definition needs to be revisited.</p> <p>We are also concerned at the assumption that if E-Scooters were to be legalised that they would be permitted to use dedicated cycle lanes. We are surprised at this unwarranted assumption bearing in mind the number of accidents that have been recorded between E-Scooter riders and cyclists.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/196
Respondent ID	8825057
Respondent Name	Merrow Residents' Association (Mr Keith Meldrum)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID11: Parking Standards</p> <p>We acknowledge the detail in your Topic Paper on parking standards which has led to your proposals. However, we</p>

make the point very strongly that experience of local developments over the past twelve years or so has demonstrated the inadequacy of existing parking standards, leading to a permanent overspill of parking onto nearby roads. We can cite examples of both large and small developments in Merrow where the result of inadequate onsite parking provision within the curtilage of new properties has led to roads becoming permanent overspill parking areas. The assumption that car ownership will fall if less space is made available for parking is typically, demonstrably false and is already leading to a situation which Policy ID11 professes to aim to avoid: "This policy aims to make provision to meet the needs of new residents and occupiers whilst limiting overspill parking on adjacent streets".

Your own "Issues, Options and Preferred Options" paper of 2020 stated that in order to achieve the aim "avoid the potential problems of congested on-street parking in new residential developments and overspill parking on adjacent local streets", you proposed to:

"Define one set of minimum car parking standards for new residential developments in the rest of Guildford borough (except Guildford town centre)".

Your proposed Policy ID11 in an almost complete reversal now sets maximum standards across all suburban areas and strategic sites. We fail to understand why this unacceptable change has been made. The rationale has not been explained either in the policy or in the SPD except by saying that the policy must cater for new developments where there will be no car parking provisions at all.

While we support the philosophy of a "modal shift" in respect of travel, high levels of access to safe walking and cycling routes and public transport as an alternative to use of private vehicles is an aspiration not presently in sight. With an ageing demographic, walking or cycling to local facilities are not options for many and public transport in Guildford has a long history of inadequacy, recently deteriorating further. We believe that the zero-carbon ambition, in respect of personal mobility, will drive the adoption of electric vehicles rather than a significant abandonment of motor cars.

We believe the setting of maximum parking standards for suburban areas, including strategic sites, is fundamentally flawed: land is expensive in Guildford and no developer is likely to allocate more space for parking than the design and, crucially, location of the development justifies. We note that the National Planning Policy Framework, Section 9, "Promoting Sustainable Transport" specifically advises against setting maximum standards other than in special cases:

	<p><i>"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport."</i></p> <p>We recommend strongly that ID11 should set only minimum parking standards in all areas of Guildford, including strategic sites and that these standards should reflect at the very least the current, (though frequently inadequate), levels.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/26
Respondent ID	38113281
Respondent Name	Ministry of Defence (Chris Waldron)
Agent Name	
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Within Policy D15- Renewable and Low Carbon Energy Generation and Storage, Section 5.261 In the event that proposals are received for wind turbines greater than domestic scale, the Council will consult with Gatwick Airport

	<p>and NATS (the national air traffic system provider).</p> <p>In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, it is requested that the diction of Policy D15 Section 2.61 is supplemented with provision for the MOD to be consulted in line with current Planning Practice Guidance published on the Gov.uk website that acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.</p> <p>In summary, the MOD request to be consulted on any development within the Aerodrome Height safeguarding zone that surrounds RAF Odiham, which consists of structures or buildings exceeding statutory safeguarding criteria. Additionally, Renewable and Low Carbon Energy Generation and Storage policy areas are supplemented with provision for the MOD to be consulted in line with current Planning Practice Guidance published on the Gov.uk website when a proposed wind turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.</p> <p>I trust this clearly explains our position on this consultation. Please do not hesitate to contact me should you wish to consider these points further.</p>
What changes do you suggest should be made to the document?	it is requested that the diction of Policy D15 Section 2.61 is supplemented with provision for the MOD to be consulted in line with current Planning Practice Guidance published on the Gov.uk website that acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.
Files	
Comment ID	LPDM21B/63
Respondent ID	10890817
Respondent Name	Mr Antony Etwell
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Not Applicable.
What changes do you suggest should be made to the document?	<p>D12 - Sustainable and Low Impact Development</p> <p>The regulation 18 approach was to provide greater detail to supplement the adopted Policy D2 which supports sustainable development. This is achieved by setting requirements and expectations for energy efficiency, resource efficiency, water efficiency, waste and embodied carbon.</p> <p>The regulation 19 approach has no significant changes however additional detail has been added in relation to support for schemes that improve the energy/carbon performance of existing buildings.</p> <p>Comment: Whilst Policy D12: Sustainable and Low Impact Development 1-6) requires development proposals to demonstrate how they have followed a ‘fabric first’ approach and to demonstrate a ‘minimising of embodied emissions’ there is no reference to the selection of materials suited to reducing life time waste of developments. A reduction of ‘Life time waste’ in building design (eg. the use of natural building materials) CONSIDERABLY reduces a building’s overall carbon reduction by sequestration and long term waste (eg. land fill). Perhaps this could be included to this policy.</p>
Files	GBC Development Management Policies - Climate Change comments V1.pdf
Comment ID	LPDM21B/64
Respondent ID	10890817
Respondent Name	Mr Antony Etwell

Agent Name	
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Not Applicable.
What changes do you suggest should be made to the document?	<p>D13 - Climate Change Adaptation</p> <p>The regulation 18 approach is to deliver climate change resilient development by setting out the considerations when designing and delivering climate change adapted development.</p> <p>The regulation 19 approach has no significant changes.</p> <p>Comment: I refer to my comment above but would also like to suggest that Policy D13: Climate Change Adaptation 4) Development proposals are required to demonstrate adaptation fro more frequent and severe rainfall events through measures including: b) designing planting, landscaping and roof structure schemes to absorb and slow down surface water;</p> <p>Roof structure schemes that incorporate biodiverse green roofs both absorb a percentage of rainfall along with ‘naturally cooling’ the interior of the dwelling in times of high temperatures due to the substrate/earth and planting utilised. An effective passive heat control measure.</p>
Files	GBC Development Management Policies - Climate Change comments V1.pdf
Comment ID	LPDM21B/65

Respondent ID	10890817
Respondent Name	Mr Antony Etwell
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Not Applicable.
What changes do you suggest should be made to the document?	<p>D14 - Carbon Emissions from Buildings</p> <p>The regulation 18 approach is to deliver climate change mitigation measures by setting out an increase to the LPSS carbon emissions once the government has set out their approach.</p> <p>The regulation 19 approach responds to the government’s Future Home Consultation by improving our extant carbon emission standard for new home from 20% to 31% and 27% fro non residential buildings.</p> <p>Comment: Policy D14: Carbon Emissions from Buildings could provide more detail in: 5) Development proposals are strongly encouraged to improve upon the standards in paragraph 4. Paragraph 4) could add: “This is required to be achieved through improvements to the energy performance of the building ‘including carbon sequestration from natural building materials’ and the appropriate renewable and low carbon energy technologies on site and/or in the locality of the development, or words to that effect.</p> <p>Given that carbon sequestration from construction materials is a key aspect in the reduction of carbon emissions an</p>

	inclusion would be appropriate.
Files	GBC Development Management Policies - Climate Change comments V1.pdf
Comment ID	LPDM21B/66
Respondent ID	10890817
Respondent Name	Mr Antony Etwell
Agent Name	
Section	Policy D15: Renewable and Low Carbon Energy Generation and Storage
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Not Applicable.
What changes do you suggest should be made to the document?	<p>Policy D15 - Renewable and Low Carbon Energy Generation and Storage</p> <p>The regulation 18 approach is to facilitate large scale renewable and low carbon development by allocating land for low and zero carbon development and requiring any new energy developments to protect biodiversity.</p> <p>The regulation 19 approach does not take forward the proposal to allocate land for renewable and low carbon technology. Instead, a policy that generally supports and facilitates renewable energy development has been suggested.</p> <p>Comment: Although allocated land within the Green Belt is deemed ‘harmful’ unless the land meets the ‘very special</p>

	<p>circumstances' test, it would be wise to continue to have open discussions as the methodology for renewable energy sites will continue to develop. In addition Surrey is known to be an area with great potential for solar energy.</p> <p>A consideration might be, that proposals associated with developers allocated sites that introduce an area within the site dedicated to renewable and low carbon energy generation and storage, that also become areas of high biodiversity net gain, could be strongly supported and encouraged.</p> <p>The Building Research Establishment (BRE) examples of recent renewable energy developments have seen net biodiversity gains as high as 178%. This might also address the issue of higher densities in GBC village environments.</p>
Files	GBC Development Management Policies - Climate Change comments V1.pdf
Comment ID	LPDM21B/20
Respondent ID	37883009
Respondent Name	Mr Edward Nicol
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	<p>I agree that the river and navigations are under-used assets for Guildford and, besides the excellent proposals in the plan, I would like the council to further study how to incorporate them (the river and navigations) more into the body of the town. In particular how to extend the High Street down to the river so that the banks can easily be part of the social life of visitors to the town centre. I could envisage an area at the bottom of the High Street with gardens and cafes where shoppers and others could easily enjoy the waterside. The issue of course is the A281 which currently</p>

	<p>provides both a physical access barrier and a view barrier. The demise of Debenhams provides an opportunity to consider some quite radical (and expensive no doubt) ideas. Alternatives to study could be putting the main road in a tunnel past the bottom of the High Street, diverting it west of the river before the Yvonne Arnaud Theatre or building a sweeping ramp from the High Street over the main road to the river. Obviously flooding and cost would be important considerations but wouldn't it be lovely if the river became a part of the town. Also the current small restricted car parking area southwest of the river could also be incorporated into the gardens. In places where the riverbank becomes a key asset of a town it improves both well-being and attracts tourists, thereby helping to offset the costs.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/412
Respondent ID	38026593
Respondent Name	Mr Nicholas Bale
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	[A response to the draft Parking SPD consultation which covers policy matters]

	Reference to research statistics from 2006 and 2010 is a flaw. Research should look at future needs, not the past.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/13
Respondent ID	8593185
Respondent Name	Mr Niels Laub
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>I note that the section H4 on Housing Density has been deleted. There should be a clear policy on housing density within the urban environment based on the prevailing densities in each area.</p> <p>There should also be a policy on the maximum height of new developments in the town centre and, once again, these should relate to specific areas. As a general rule, no development in the town centre should exceed six storeys in height.</p>
What changes do you suggest should be made to the document?	<p>The document should include policies on housing density based on the prevailing densities in each area.</p> <p>The document should also include a policy on the maximum height of new developments based on the prevailing</p>

	height of existing developments and generally speaking this should not exceed six storeys.
Files	
Comment ID	LPDM21B/92
Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	<p>The objectives of achieving high quality design and respecting local distinctiveness is of course welcome.</p> <p>A major concern is the lack of guidance on building height which is a significant aspect of design, particularly in the town because of the topography. There appears to be increasing risk to the townscape and character of areas elsewhere in the borough from high buildings. Can the policy be improved to give greater confidence that we will not be faced with a situation similar to the Solum development?</p>
What changes do you suggest should be made to the document?	The Council should prepare a Building Heights Strategy for the borough - treating the different areas on a zonal basis. The agreed strategy would be implemented by means of an SPD providing guidance on building height, that would be referenced in Policy D4.
Files	
Comment ID	LPDM21B/93

Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	Para 5.14 states (in second sentence) 'Optimising the density....enables the delivery of much-needed homes..' . The use of 'optimising' is welcomed. Optimising should be the aim, and it is not the same as 'maximising' i.e. should not be read as inferring the largest number of houses on a site
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/95
Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	Yes

Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	This policy is welcome, and necessary for the future protection of the river.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/98
Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	The aims of this policy and the content are sound and welcome. One of the evidence sources quoted is the council's 'concept proposals for the routing of the Sustainable Movement

	Corridor'. The implementation of the SMC is going to take place in stages, and there is currently a degree of uncertainty about the specification and phasing. It is recognised that this requires the engagement of SCC as the local highway authority. A position statement on the status of the SMC should be issued and regularly updated to inform the planning process.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/94
Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	<p>The introduction of a Parking SPD is welcome.</p> <p>The change from reg 18 consultation of the residential parking standard from minimum to maximum is unhelpful. While the aim of achieving modal shift is fully justified, the conditions for reducing car use in the medium term cannot be assured. In the interests of avoiding excessive on-street parking as a consequence of under-provision of</p>

	spaces, the standards should be minima except in the town centre.
What changes do you suggest should be made to the document?	Change maximum standards to 'minimum', or possibly 'expected'.
Files	
Comment ID	LPDM21B/405
Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	[A response to the draft Parking SPD consultation which covers policy matters] There is surely a case for including the standards for Strategic Sites within the SPD, rather than in Appendix B to ID11.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/406
Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>We consider that the standards set in the SPD should be treated as minimum standards (as in the Reg 18 consultation) except in the town centre.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/407
Respondent ID	8599201
Respondent Name	Mr Richard D Jarvis
Agent Name	
Section	Policy ID11: Parking Standards

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	[A response to the draft Parking SPD consultation which covers policy matters] We ask for the standards for villages and rural areas (Table A2) to be set as 'minimum', rather than 'expected' standards.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/152
Respondent ID	8886945
Respondent Name	Ms Julia Osborn
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p><u>Policy H5: Housing Extensions and Alterations including Annexes</u></p> <p>I totally support this policy for alterations and extensions to have regard to the impact on existing street scene and neighbouring properties and for extensions to be respecting and in proportion to the surrounding/ and existing built form.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/153
Respondent ID	8886945
Respondent Name	Ms Julia Osborn
Agent Name	
Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy H6: Housing conversion and sub-division</u></p> <p>It is disappointing that this policy does not address the change of use between c3 to c4 HMO (house of multiple occupation) dwellings. And that a C4 direction is not adopted which would enable GBC to have discretion to control</p>

	the number of private dwelling houses that are being converted into HMOs by requiring all new HMOS to have planning permission for C4 use.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/151
Respondent ID	8886945
Respondent Name	Ms Julia Osborn
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy H4: Housing Density</u></p> <p>I note the policy has been deleted and wording inserted in Policy D4, but I believe that more perspective guidance on min/max density for village sites would help prevent urbanisation and over intensification of development sites in villages.</p> <p><u>Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness</u></p>

	<p>I would support:</p> <p>Point 3, “Development proposals should respond positively to the history of a place, significant views.. prevailing character, landscape and topography”.</p> <p>Points 8, 9 and 10 of the policy to ensure that design applied to an early stage of master planning on strategic sites.</p> <p>I believe that the definition wording in para 5.15 “lower densities in more sensitive parts such as on the edge of the settlement [are required] to form a more sympathetic transition between the built-up area of the new site and the surrounding countryside [and existing built form]” be added to the list of points for the policy.</p> <p>I welcome a designed focused approached to sites but believes that more prescriptive guidance on suitable min-max density for sites in village locations would help to avoid densities that are more suited to urban environments from being applied to village locations.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/14
Respondent ID	10970881
Respondent Name	ms Philippa Mitchell
Agent Name	
Section	Introductory sections
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	It all seems fine
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/15
Respondent ID	10970881
Respondent Name	ms Philippa Mitchell
Agent Name	
Section	Policy H6: Housing Conversion and Sub-division
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Sub-dividing or converting a large house into HMO can result in a far greater increase in numbers of people in an area. The impact of this on local transport infrastructure does not seem to be included at this point.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/16
Respondent ID	10970881
Respondent Name	ms Philippa Mitchell
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	The wording about the protection of existing habitats and what must be done is a bit weak. The term 'expected' is used frequently whereas it should be a stronger word such as 'must'.
What changes do you suggest should be made to the document?	<p>In 5 change to 'Planting and landscaping ARE REQUIRED TO species, habitats ...</p> <p>In 6 - Tree Canopies must be retained, not 'expected to be retained'</p> <p>In 7 change to 'Plantings schemes MUST ONLY use UK sourced native species, unless..</p> <p>In 9 - change to 'Development proposals ARE REQUIRED to create areas...'</p> <p>In 11 again, change to 'Major development proposals are REQUIRED to, and minor development proposals are expected to...'</p> <p>13 - There should be biodiversity net gain on all developments whether previously developed or not. Change this to say 'Biodiversity net gain IS A Requirement on previously developed land.</p> <p>15 - the time period should be much longer. At least 100 years, otherwise companies will just bide their time and destroy the land 30 years down the track.</p> <p>Monitoring indicators - why only on larger developments of 25 homes or more? The monitoring should be on all size</p>

	of development from a single property up. Otherwise you are encouraging smaller proposals even if the developments all flow into each other - this is providing an escape loop to developers
Files	
Comment ID	LPDM21B/17
Respondent ID	10970881
Respondent Name	ms Philippa Mitchell
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Will the mitigation hierarchy prevent any damage to protected areas and species or can developers get around it by saying that the development is needed despite the fact it will destroy habitats and species?</p> <p>If the latter, the wording needs to be changed as below:-</p>
What changes do you suggest should be made to the document?	<p>In 1 - remove the words 'through the application of the mitigation hierarchy'. These habitats and species should be protected and if a development will impact them, the development should not go ahead. They need to have greater protection from development than a cathedral, church, ancient building or other man-created thing. Mitigation hierarchy should not apply to habitats and species that have been identified as of great conservation importance.</p> <p>In 2 remove the section 'unless there are wholly exceptional reasons and the benefits of the development proposal outweigh the loss of the habitat' - if you would not pull down the Houses of Parliament for this development, then the</p>

	development does not outweigh the loss of an irreplaceable habitat. In 3 - Ancient Woodlands and ancient or veteran trees are irreplaceable and should always fall within that category. No development permitted within or within 20m and they should be managed to enhance the woodland character.
Files	
Comment ID	LPDM21B/370
Respondent ID	20475361
Respondent Name	National Grid
Agent Name	Avison Young (Amy Hordon)
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Utilities Design Guidance</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.</p> <p>National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.</p> <p>Therefore, to ensure that Design Policy D4 is consistent with national policy we would request the inclusion of a policy strand such as:</p>

	<u>“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</u>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/39
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H5: Housing Conversion and Sub-division</p> <p>The Key Evidence Base relies on the SHMA from 2017, which is out of date and needs to be updated for the revised ONS data and the 2021 Census data when published.</p>
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/40
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H7: Review Mechanisms</p> <p>The strategic sites need earlier reviews than ‘mid-stage’.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/41
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	

Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H8: First Homes</p> <p>The definition of Affordable Home is a price not exceeding £250,000 after the 20% discount, which cannot be considered affordable for most first time buyers.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/42
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	
Section	Policy E11: Animal-related Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	<p>Policy E11: Animal related development</p> <p>Para d) needs definition of how unacceptable neighbouring amenity will be determined.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/31
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>PolicyP6/P7: Biodiversity in new developments</p> <p>We would like to see the Local Nature Biodiversity Strategy, but it has yet to be prepared.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/32
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness</p> <p>AVRs should be discussed with Parish Councils as a statutory body.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/33
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)

Agent Name	
Section	Policy D7: Advertisements, Hanging Signs and Illumination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D7: Advertisements, Hanging Signs and Illumination</p> <p>This policy should contain specific direction about signs in Conservation Areas, as in para 5.69</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/34
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	
Section	Policy D8: Public Realm
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D8: Public Realm</p> <p>Add sub para 2j they do not compromise or remove existing Public Rights of Way.</p> <p>Para 5.85 This should contain a direction that any existing public realm should not be compromised or destroyed</p> <p>Para 5.87: reducing space for private cars is unrealistic as most households, particularly those out of urban areas, will want to retain their private vehicles.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/47
Respondent ID	23273377
Respondent Name	Ockham Parish Council (Imogen Jamieson)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment

Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

On many country lanes this is unrealistic:

Para 6.86 accepts ‘current facilities on the carriageway do not necessarily present an attractive choice for those less confident or returning to cycling’;

Para 6.92: ‘the SPD contains design principles for (inter alia) the Former Wisley Airfield. Developers should adhere to the principles within this SPD in developing on and off- carriageway cycle routes’

Para 6.93: ‘facilities shared by walkers and cyclists will generally no longer be appropriate.’

Appendix A Cycle Network Map:

The Map shows routes which are partly over impassable muddy tracks and partly over dangerous narrow 40mph country lanes, frequently carrying illegally HGVs: (1) from Wisley, over the A3 bridge, up Elm Lane, across the airfield, over Stratford Brook to Appstree Farm, along Alms Heath and along the dangerous Ockham Road North to Horsley; and (2) from the Ockham Park roundabout, along the airfield runway on Footpath 13, across the fields to Ockham Lane, then to dangerous Old Lane to Effingham Junction.

On a fine dry day, experienced cyclists would struggle with both of these routes. In the dark, or in rain, all cyclists would avoid these routes. They cannot be considered as part of a ‘Network’.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/105

Respondent ID

29234625

Respondent Name

Portland Capital

Agent Name	Quod (Mr Daniel Rech)
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy H7 – Review Mechanisms</p> <p>1.1 Policy H7 should recognise there may be circumstances where a review is not appropriate – for example where the applicant has committed to over provide affordable housing upfront. Failure to do so will remove the incentive for applicants to provide more affordable housing than is technically viable. This would significantly reduce the number of affordable homes delivered over the plan period.</p> <p>1.2 Any surplus identified by the review must be shared equally (50/50) between the developer and the council to ensure there is sufficient incentive for the developer to maximise the viability of the scheme. Failure to take a shared approach will reduce the amount of affordable housing delivered via review mechanisms over the plan period.</p> <p>1.3 The policy should also include flexibility for a lower cap to be agreed where considered appropriate (e.g.if the scheme is providing significant social infrastructure).</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/106
Respondent ID	29234625

Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy H8 – First Homes</p> <p>2.1 Policy H8 should provide flexibility for an alternative approach to be agreed where fully justified.</p> <p>2.2 National planning policy is a material consideration only (not an absolute requirement). Other material considerations may support an alternative approach on certain sites. For example, local housing needs may support the need for more affordable types of ownership products (e.g. shared ownership). Viability/ deliverability evidence for schemes with large upfront infrastructure costs may demonstrate there is a need for the affordable housing to be forward funded (this is not possible with First Homes).</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/107
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)

Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy P6/P7 – Biodiversity in New Developments</p> <p>3.1 Policy P6/P7 wording should be updated to allow additional flexibility relative to the requirement to seek maximum biodiversity gain and the provision of biodiversity features (planting schemes/landscaping, measures on building structures and site design) where this may compromise wider residential delivery.</p> <p>3.2 Such a requirement should be reviewed on a site-by-site basis. This is reflective of the consideration of viability identified within the NPPF and identifying land for homes.</p> <p>3.3 At Paragraph 68 it states: Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. (Quod Emphasis)</p> <p>3.4 Policy 124 of the NPPF relates to achieving appropriate densities and states planning policies and decisions should support development that makes efficient use of land, taking into account (amongst other criteria) - local market conditions and viability.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/108
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy P8/P9 – Protecting Important Habitats and Species</p> <p>4.1 Policy P8/P9 Criteria 1 needs to be updated to outline specific requirements in relation to appropriate buffers/ barriers between built development and sensitive habitats. Current policy wording defines the appropriate buffer for ancient woodland but for example there is no further detail about requirements for aquatic habitats.</p> <p>4.2 A requirement for such provision should be reviewed on a site-by-site basis and will have viability implications for deliverability which should be recognised in final policy wording. This is reflective of the consideration of viability set out at paragraphs 68 and 124 of the NPPF outlined previously.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/109
Respondent ID	29234625

Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy P12 – Water Quality, Waterbodies and Riparian Corridors</p> <p>5.1 Policy P12 Criteria 2 is too vague at present and wording needs to be clear on requirements for demonstrating that opportunities to improve chemical and ecological status of a waterbody have been explored.</p> <p>5.2 Policy P12 Criteria 4 needs to make clear that any requirement to improve and/or restore the flow of a functioning watercourse will be reviewed on a site-by-site basis and be subject to viability.</p> <p>5.3 Policy P12 Criteria 5 needs to be revised to reflect the potential for proposals to deliver improvements to the riparian environment via a more flexible approach to the minimum buffer zone, with the 8m minimum being the starting point. Wording is suggested as follows:</p> <p>Development proposals <u>should seek to</u> are required to retain or reinstate an undeveloped buffer zone on both sides of a main river measuring a minimum of <u>8m</u> 10m from the top of the riverbank that is supported by a working methods statement detailing how the buffer zone will be protected during construction, and a Landscape and Ecological Management Plan detailing how it will be enhanced in the long term.</p> <p>5.4 There is no national or local 10m buffer zone requirement. As drafted, the proposed policy is not aligned with Environment Agency standard which requires a minimum 8m buffer to be provided, which relates to access requirements for a main river zone.</p>

5.5 In addition, there are a range of no build widths along the River Wey and it is right that there is variety along the riverside with the wider design and place-making requirements secured via other elements of the plan. In this context, any buffer should be reviewed on a site-by-site basis and in the context of existing site conditions / emerging design proposals. Consideration of quantitative factors and other benefits such as biodiversity net gain and increased public access should be a consideration in the determination of planning applications which could be undermined by the current wording / requirement. Additional wording to be added to Criteria 5 is suggested as follows:

Any buffer zone requirement will be reviewed on a site-specific basis and considered in the context of wider quantitative benefits seeking to improve the riparian habitat.

5.6 Policy P12 Criteria 6 needs to be revised to include additional flexibility. As per the above there are potentially significant design implications arising from a blanket requirement for banks to be returned to a natural state. Wording should acknowledge such a requirement needs to be reviewed on a site-by-site basis and in the context of existing site conditions and emerging design proposals.

5.7 In addition to the above policy wording needs to be updated to allow for viability consideration as per Paragraph 68 of the NPPF which states:

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. (Quod Emphasis)

5.8 Policy 124 of the NPPF relates to achieving appropriate densities and states planning policies and decisions should support development that makes efficient use of land, taking into account (amongst other criteria) - local market conditions and viability.

What changes do you suggest should be made to the document?

Files

Comment ID	LPDM21B/110
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy D4 - Achieving High Quality Design and Respecting Local Distinctiveness</p> <p>6.1 Policy D4 wording which relates to densities (Criteria 5 and 6) should go further and align with the NPPF to encourage an uplift in densities in appropriate locations by recognising minimum density ranges.</p> <p>6.2 This is consistent with NPPF Paragraph 125 which states:</p> <p>125. Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, <u>it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.</u> In these circumstances:</p> <p>a) <u>plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be</u></p>

shown that there are strong reasons why this would be inappropriate;

b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and

c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). (Quod Emphasis)

6.3 Flexibility with regards to the application of design standards is identified further in paragraph 130 of the NPPF which identifies planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

6.4 The current policy wording does not go far enough to recognise the above and there is no definition of how it will be determined increased density is 'detrimental' as per wording at Criteria 6.

6.5 While the need to recognise and respond to existing character is supported, policy should include greater flexibility to allow development of higher densities to come forward in appropriate locations and not preclude appropriate innovation.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/111

Respondent ID

29234625

Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy D11 – The Corridor of The River Wey and Godalming Navigations</p> <p>7.1 Portland Capital is supportive of the aspirations that seek to improve visual and physical public access to and along the River Wey. The approach relative to the provision of features seeking to enhance the riverside should be kept flexible where this may compromise wider delivery and be reviewed on a site-specific basis. There are potentially significant benefits of enabling sites which currently detract from the river corridor that could be jeopardised by over-burdening such sites with specific policy requirements.</p> <p>7.2 At present Policy P12 (Water Quality, Waterbodies and Riparian Corridors) has the potential to conflict with policy D11 in the context that that it seeks to impose a 10m buffer with no consideration of quantitative factors and other benefits to be delivered such as those referenced in Criteria 2 which could be undermined by such a requirement.</p> <p>7.3 The two policies need to be aligned with policy P12 updated to allow additional flexibility (recognition of quantitative factors) and a revised buffer requirement which is consistent with Environment Agency approach.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/112
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy D18: Conservation Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy D18 – Conservation Areas</p> <p>8.1 Policy D18 needs to be closer aligned with NPPF wording (specifically paragraphs 199 – 208). The key policy test with regards to heritage is identified in paragraph 200 which states any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.</p> <p>8.2 Emerging policy should give greater recognition to paragraphs 201 and 202 of the NPPF which relate to the balancing provisions with regards to heritage assets in cases of either substantial harm or less than substantial harm.</p> <p>8.3 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p> <p>8.4 It is possible for development to come forward in sensitive locations that promotes a scale and density which is greater than the surrounding context while also responding to heritage assets and delivering significant public benefits. At present the policy appears overly restrictive with no recognition of the balancing provisions set out in the NPPF.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/113
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy ID6: Open Space in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Quod Representation: Policy ID6 - Open Space in New Developments</p> <p>9.1 Portland Capital is supportive of the recognition within supporting policy justification that certain types of development are unlikely to increase demand for particular types of open space and that the requirement to provide open space for children and youths, and allotments does not apply to purpose-built student accommodation.</p> <p>9.2 Policy wording should be updated however to allow additional flexibility relative to the requirement to provide open space on site and requirement for financial contributions where this may compromise wider residential delivery.</p> <p>9.3 Such a requirement should be reviewed on a site-by-site basis. This is reflective of the consideration of viability identified within the NPPF and identifying land for homes. At Paragraph 68 it states:</p>

	<p>9.4 Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, <u>taking into account their availability, suitability and likely economic viability.</u> (Quod Emphasis)</p> <p>9.5 Policy 124 of the NPPF relates to achieving appropriate densities and states planning policies and decisions should support development that makes efficient use of land, taking into account (amongst other criteria) - local market conditions and viability.</p> <p>9.6 Current policy wording is likely to result in a conflict between the NPPF which seeks to maximise residential density and the efficient use of land in sustainable locations, and the need to provide open space in line with the emerging policy standards.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/114
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	Quod Representation: Policy ID10 – Achieving a Comprehensive Guildford Borough Cycle Network 10.1 Any requirement to deliver site-specific requirements for cycle infrastructure will have viability implications for deliverability which should be recognised in final policy wording. This is reflective of the consideration of viability set out at paragraphs 68 and 124 of the NPPF outlined previously.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/115
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Quod (Mr Daniel Rech)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Quod Representation: Policy ID11 – Parking Standards 11.1 Policy ID11 criteria 2c and 2e for strategic sites are the same as criteria 3c and 3e for non-strategic sites. The policy could be made clearer and simplified if these points are included under criteria 5 for all sites.

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/395
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Iceni Projects Limited (Sir or Madam)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>Policy ID11 is generally clear as much of the detail is referred to in the Draft SPD, however, the wording within Policy ID11 for points 2)b and 2)c for strategic sites are essentially the same as points 3)c and 3)e for non-strategic sites. To simplify the policy these sentences could be covered under point 5) For all sites.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/396

Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Iceni Projects Limited (Sir or Madam)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>Despite the requirement for ‘Individual assessment/justification’ to be undertaken there is no guidance is provided as to the criteria in which this assessment/justification needs to adhere to, which could lead to some discrepancy between sites and determining what extent of work is necessary and the factors which would suggest a site to be accessible, or not. Additionally, as with other authorities, there can be scale used to show how accessible a site is e.g., Poor, Good, Excellent.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/397
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Iceni Projects Limited (Sir or Madam)

Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>It is assumed that, in Table A4 of the Draft Parking SPD, Residential would include for Residential Institutions as well as Dwelling houses, but it would be useful to clarify.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/398
Respondent ID	29234625
Respondent Name	Portland Capital
Agent Name	Iceni Projects Limited (Sir or Madam)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document	

complies with the Duty to cooperate?	
Comment	[A response to the draft Parking SPD consultation which covers policy matters] The absence of a standard for the minimum provision of short-stay for residential use leads to a concern in regard to cycle parking for visitors.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/68
Respondent ID	28680513
Respondent Name	Regulatory Services, Guildford Borough Council (Mr Gary Durrant)
Agent Name	
Section	Introductory sections
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	No Comments.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/69
Respondent ID	28680513
Respondent Name	Regulatory Services, Guildford Borough Council (Mr Gary Durrant)
Agent Name	
Section	Policy P10: Land Affected by Contamination
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	<p>The contents of this section are correct as far as the regulatory role of the Council with reference to Part IIA EPA 1990.</p> <p>The policy is also in line with the current and past approach to land which is potentially contaminated.</p> <p>A very well written policy and background information.</p> <p>Environment and Regulatory Services</p>
What changes do you suggest should be made to the document?	No changes suggested.
Files	
Comment ID	LPDM21B/70
Respondent ID	28680513

Respondent Name	Regulatory Services, Guildford Borough Council (Mr Gary Durrant)
Agent Name	
Section	Policy P11: Air Quality and Air Quality Management Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	The content of the policy reflects the comments I made at an earlier stage of the process and I believe the policy will help all disciplines with air quality around new developments.
What changes do you suggest should be made to the document?	None
Files	

Comment ID	LPDM21B/71
Respondent ID	28680513
Respondent Name	Regulatory Services, Guildford Borough Council (Mr Gary Durrant)
Agent Name	
Section	Policy D10: Noise Impacts
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>I have commented at an earlier stage and agree with the contents of the policy , which I believe will help the noise issues associated with future planning developments.</p> <p>Environment and Regulatory Services</p>
What changes do you suggest should be made to the document?	None
Files	
Comment ID	LPDM21B/72
Respondent ID	28680513
Respondent Name	Regulatory Services, Guildford Borough Council (Mr Gary Durrant)
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	<p>My discipline is mainly associated with the statutory nuisance powers under Section 79 Environmental Protection Act 1990, which is mentioned in the text. Prevention of problems prior to development is a powerful tool and I welcome the policy.</p>

	Environment and Regulatory Services
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/383
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Ripley Parish Council (RPC) welcomes the opportunity to review the proposed revisions and amendments to the adopted 2019 Local Plan. It is Ripley’s opinion that the new Local Plan: Development Management Policies presents an ideal opportunity to put into place measures that will help the borough tackle the climate emergencies that we face. It is of the utmost importance that measures are put in place to both mitigate biodiversity decline and to transition towards a zero-carbon economy. Ripley Parish Council makes the following comments on the various papers:</p> <p><u>Policy P6/P7 Biodiversity</u></p>

3.8 c) the particularly acute and continuing biodiversity decline in Surrey and the severe implications for the economy, society and environment if a recovery is not realised.

In our opinion this statement should be at the forefront of all discussions regarding all new development, wherever it is located. GBC should have robust policies in place to require net gain in biodiversity as a bare minimum for all planning decisions. As a society we cannot continue to plunder the natural world around us and it is therefore imperative that the Borough Council insists upon the highest standards of construction methods, landscaping and planting schemes.

Site Design

3.23 RPC wholeheartedly agrees with the principle of designing-in biodiversity from the outset, with connectivity between habitats – again this should be an absolute requirement for all new development

Support for Biodiversity sites and guidance on SANGS

3.60 There needs to be a clear distinction between SANG and BNG provision and implementation. Furthermore, we would propose that much more thorough vetting of proposed SANG sites is undertaken, given there have been contentious issues regarding some of the more recent SANG approvals within the borough. A simple land swop from one site to another gives no real assurance for the protection of wildlife. Many new SANGs are effectively allowing new open space for residents to walk and exercise dogs, without any due consideration for the wildlife that already exist there in a relatively undisturbed environment. Meanwhile the wildlife that has been uprooted from their habitat as a result of new development still have little or no opportunity to transplant themselves elsewhere.

Biodiversity net gain

5.2 The Homebuilders Federation have a vested interest in ensuring maximum profit for their members and as such are always likely to object to anything that is going to add cost. RPC advocates that this fact is recognised and GBC has some robust policies in place to counteract this inevitable discrepancy. We would support GBC desire to achieve 20% net gain as opposed to the national prescribed standard of 10%, in particular because so much of our precious Green Belt land in the borough has been removed and will likely be subjected to new development.

	<p><u>Appraisal findings</u></p> <p>5.1 Discussion</p> <p>Furthermore, the profitability for housebuilders undertaking a new development within the borough should not be a consideration for GBC when assessing biodiversity net gain, even if it impacts upon the funding for other non-biodiversity objectives.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/385
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<u>Ancient Woodland and significant trees</u>

	<p>5. RPC wholeheartedly agrees with the proposals and look forward to seeing robust defence of these very important trees as part of the carbon-reduction policy for the borough. In particular, RPC advises that this policy must be adopted for the Garlicks Arch development at Burnt Common which is surrounded by ancient woodland which has already undergone significant damage from the construction of the A3 right through the middle of a large area of ancient woodland. We approve of the clear separation between woodland and development but note that in this document GBC is discouraging harmful activities such as using the woodland as a cut-through, whilst in fact the Garlicks Arch development is seen to be doing exactly this. We would welcome a review of the Garlicks Arch plans in this context.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/384
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy P12: Water Quality, Waterbodies and Riparian Corridors
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<u>Development affecting watercourses</u>

	<p>3.97 The proposal to reconsider the EA 10m buffer for ordinary watercourses is insufficient and will inevitably lead to potential damage and pollution. It is not sufficient to consider this on a case by case basis with a stated minimum standard only regarded as highly desirable, as it will be all too easy for the developer to manipulate this situation to their advantage.</p> <p>6. We agree with the proposal to withhold permission to culvert watercourses and again have some concerns that this aspect needs to be addressed at the Garlicks Arch development where there will be significant SuDS groundworks undertaken which will impact upon the stream running through the site, which feeds into the River.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/386
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<u>Major developments and developments in areas at risk of flooding</u>

	We welcome these robust policies. We would comment however RPC did not agree with the assessments for flood risk undertaken for Garlicks Arch, given our personal experiences of the location over a long period and in particular given the change in weather patterns over the past decade which have caused frequent flooding at the site. We would recommend that GBC gives more credibility to those residents with local knowledge of flooding at potential development sites in order to more accurately assess the suitability of the land. Computer modelling does not always give you the whole picture.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/387
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Light-Generating Development</u></p> <p>RPC queries whether our Lovelace Neighbourhood Plan establishes the standard required or whether the Local Plan</p>

	will take precedence? We consider the LNP to be more robust.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/390
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy D18: Conservation Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Historic Environment</u></p> <p>Ripley is widely regarded as one of the jewels in the crown of Surrey and although the centre of the village has been afforded some protection owing to its conservation status, this does not appear to have been sufficient as we have several buildings constructed over the past 40 years with little or no architectural merit. Whilst we welcome new technologies used in construction that offer advances in thermal gain, for example, it is important to recognise the rich historical tapestry that hundreds of years of building has created in Ripley. It is essential to consider the design aesthetically in order that it does not jar with its surroundings and this should be more carefully considered and</p>

	<p>evaluated in all planning decisions. Let us build beautiful buildings as the Victorians did so successfully and leave a legacy of which we can all be proud.</p> <p>RPC feels very strongly that there is potential in this policy to further protect and enhance our village as a cultural asset and would welcome further discussion on this point.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/391
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Local Context</u></p> <p>2.15 We would agree that there is no conflict between policies ID5 and ID6</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/388
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy ID10 Cycle Network</u></p> <p>Whilst RPC would continue to support the premise of sustainable transport throughout the borough, a realistic approach must be taken for developments in a more rural setting. The road width of most rural lanes simply cannot provide for cycle lanes, without severely compromising safety for cyclists and all other road users. A desire for sustainability must go hand in hand with practicality and an acceptance that we live in a northern European country with unsuitable weather for cycling for six months of the year.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/389

Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Parking Standards</u></p> <p>RPC draws your attention to the parking standards already required by our Lovelace Neighbourhood Plan. We are acutely aware of the problems caused by unrealistically low parking allocations set by GBC currently. Irrespective of the size of the development, RPC feels very strongly that our own Neighbourhood Plan requirements are more suitable for any new development in our parish. Given that we are a semi-rural village with limited public transport links, we anticipate that the car will continue to be the only viable transport option for most residents. Thereby adequate allocated parking provision must be adhered to as set out in the Lovelace Neighbourhood Plan. It is another example of how local knowledge for a particular requirement should supersede an overall blanket policy set by GBC.</p> <p>RPC would also strongly support adequate provision for EV charging points for all new homes, not just at Strategic Sites. Every development should be required to provide charging points, regardless of the size and number of units. Residents at smaller new developments should not be disenfranchised by the lack of suitable EV charging. This is not joined up thinking, and is akin to saying that only residents living in huge new development villages will want to drive an electric car. If we want to hit our carbon neutral targets, we must make it easier for residents to make radical changes, such as the switch from fossil fuelled cars to electric vehicles.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/392
Respondent ID	15278369
Respondent Name	Ripley Parish Council (Jim Morris)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>PARKING STANDARDS</p> <p><u>Rationale: Development Management Policies Approach</u></p> <p>4.2 We are pleased that Neighbourhood plans should take precedence</p> <p>4.4 Given that Garlicks Arch is a non-strategic site, following our comments already stated above, RPC believes that the parking standards in the Lovelace Neighbourhood Plan should take precedence over any other policy.</p> <p>4.10 We would strongly object to GBC LPDMP taking precedence and superseding parking standards in our existing Neighbourhood Plan.</p>

	<p>4.11 The specific provision referred to is somewhat vague – what exactly does this mean?</p> <p>4.13 Agreed</p> <p>4.14 Agreed</p> <p><u>Electric Vehicle Charging Points</u></p> <p>4.94 RPC welcomes a cohesive strategy for the provision of EV charging points and hopes that this policy is adopted for all new development regardless of volume of units, the size of property and whether it is commercial or residential.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/103
Respondent ID	25985537
Respondent Name	Royal Society for the Protection of Birds (Mr Jack Thompson)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment

2. Protecting chapter

2.1 Biodiversity Net Gain

The RSPB welcomes the inclusion of general principle 12 of Policy P6/P7: Biodiversity in New Developments (p.35) regarding Biodiversity Net Gain:

'12) Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 per cent, or the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology.'

Advice to Defra from members of the Natural Capital Committee suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses. Therefore, 10% sits as an absolute minimum level of net gain for Defra to confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives². Defra's Biodiversity Net Gain Consultation Impact Assessment also highlights examples of an increase in the required percentage of net gain: 'The Planning authority for Lichfield District requires a net gain of 20% on new development, and experience to date suggests that developers are able to meet this requirement and often achieve much greater levels of biodiversity net gain.' The RSPB is therefore **pleased to see** the implementation of policy around Biodiversity Net Gain with a suggested minimum of 20%, in order to gain a greater level of certainty for genuine net gain as a result of Biodiversity Net Gain policy and to see tangible net gain benefits for key priority species and habitats in the Borough. Further information on the recommendation for 20% Biodiversity Net Gain in Surrey's Local Authorities can be found on the Surrey Nature Partnership website.

2.2 Trees

The RSPB **welcomes** para 4.32 (p.39) of Policy P6/P7 relating to tree planting:

'Tree planting schemes should create connected canopies as well as extend existing canopies as this provides greater biodiversity benefit than the same number of trees planted separately. Biodiversity benefit should be considered in terms of canopy area rather than simply the number of trees. Grouped trees should be adequately spaced at maturity.'

And, para 4.33 (p.39):

'However, the creation of new canopies should avoid adverse impacts on sensitive habitats and species e.g. by replacing or fragmenting important habitats such as acid grassland or lowland meadow, reducing the availability of water locally or preventing the movement of wildlife, and there may be cases where a greater benefit can be achieved through a more even distribution of trees throughout new greenspaces.'

The above policies on tree planting and canopy creation can be summarised as the *'right tree, in the right place'*, a position in alignment with the Surrey Nature Partnership⁴ and Surrey County Council⁵. It is critical that tree planting focuses on connecting and enhancing existing treescapes under the Lawton principles, and that any planting also considers and avoids irreplaceable habitats, as defined in para 4.53 (p.45) and listed in para 4.66 (p.47) of Policy P8/ P9: Protecting Important Habitats and Species.

2.3 Provisions for swifts and other urban species

The urban areas around Guildford Borough are also hotspots for the common swift (*Apus apus*), a UK Red Listed bird⁶ experiencing severe declines due to a range of issues including lack of suitable nesting sites and feeding opportunities.

Paras 4.34 to 4.36 (*Measures on building structures*, p.39-40) include provisions to reverse the declines for species commonly living on or within built structures (e.g. swifts, house martins, house sparrows and many bats). Proposals include (para 4.35, p.40):

'integrating roosting and nesting boxes, bee bricks and green and brown roofs and walls that provide foraging and nesting habitats for birds and insects.'

The RSPB **welcomes** these recommendations but consider that GBC could **provide more certainty** to the incorporation of these features through mandatory planning conditions. Such conditions have been included within Local and City Plans around England. For example, in Brighton and Hove City Council have recently (2020) included a *'Guidance note for provision of swift boxes (including swift bricks) in new development'* document to provide householders and developers with advice on the requirement for swift brick/box provision under certain development criteria. This guidance document supports requirements outlined within Brighton and Hove City Council's City Plan Part 2 Submission document (DM37 para 2.281, p.114-115). Similar examples of nesting requirements can be found in Oxford, Cornwall, and Exeter.

	<p>The RSPB has developed the conservation mapping tool SwiftMapper; the application records local observations of swift activity and nesting to help guide conservation efforts for swifts. It is noted that</p> <p>Guildford Town and its urban areas provide a high density of swift observations. The RSPB would therefore welcome further discussion with GBC to explore how to incorporate further measures and wording around such measures into Guildford Borough Local Plan and its supporting documents, especially around the urban areas of Guildford Town.</p> <p>We hope you find these comments useful. We would welcome the opportunity to discuss these comments with you in further detail.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/371
Respondent ID	8563169
Respondent Name	Send Parish Council (Mrs Debbie Hurdle)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<u>Policy H5: Housing Extensions and Alterations including Annexes</u> SPC strongly supports this policy for alterations and extensions to have regard to the impact on existing street scene and neighbouring properties and for extensions to be respecting and in proportion to the surrounding/ and existing built form.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/372
Respondent ID	8563169
Respondent Name	Send Parish Council (Mrs Debbie Hurdle)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<u>Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness</u> SPC welcomes this policy and in particular supports:

	<p>Point 3, “Development proposals should respond positively to the history of a place, significant views.. prevailing character, landscape and topography”.</p> <p>points 8, 9 and 10 of the policy to ensure that design applied to an early stage of master planning on strategic sites.</p> <p>SPC would request that the definition wording in para 5.15 “lower densities in more sensitive parts such as on the edge of the settlement [are required] to form a more sympathetic transition between the built up area of the new site and the surrounding countryside [and existing built form]” be added to the list of points for the policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/373
Respondent ID	8563169
Respondent Name	Send Parish Council (Mrs Debbie Hurdle)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<u>Policy D9: Residential Infill Development Proposals</u>

	SPC welcomes the additional guidance this policy provides for Infill development.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/283
Respondent ID	38216001
Respondent Name	Shanly Homes (Ian Rennie)
Agent Name	
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>The policy as drafted seems arbitrary in that it would allow the Council simply to use its discretion to determine whether a review mechanism is required or not. This would effectively allow the Council to insist on a review mechanism for every scheme involving viability.</p> <p>Such an approach which seemingly ignores key considerations such as the size of the site and phasing seems unnecessarily punitive particularly in relation to small/medium scale developments.</p> <p>A more reasonable approach would be to consider review mechanisms in circumstances where larger scale</p>

	<p>developments are not commenced within an agreed time period (we have agreed 18/24months with other authorities).</p> <p>A blanket approach on all sites would essentially override the outcomes of often protracted viability discussions at application stage which would be at odds with the objectives of the viability process.</p> <p>I would therefore respectfully urge you to reconsider the wording of this draft policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/334
Respondent ID	17373345
Respondent Name	Sport England (Mr Owen Neal)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness</p> <p>Sport England welcomes inclusion of a reference to Sport England’s Active Design guidance (2015) within the</p>

	reasoned justification section for the policy. This will help to promote the design and shaping of places and spaces which encourage and support healthy and active lifestyles and communities.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/335
Respondent ID	17373345
Respondent Name	Sport England (Mr Owen Neal)
Agent Name	
Section	Policy D10: Noise Impacts
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D10: Noise Impacts</p> <p>Sport England refers to our comments at the preferred options stage in which we comment that the approach to the Agent of Change principle is too narrow. Sport England notes that our comments have not been taken into account on this matter and that the focus of the policy is too narrow with an emphasis on noise only. Sport England considers that other impacts eg lighting should be included, especially as new development within close proximity to sports facilities which are floodlit may give rise to lighting issues.</p>

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/332
Respondent ID	17373345
Respondent Name	Sport England (Mr Owen Neal)
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID5: Protecting Open Space</p> <p>Sport England notes that the intention of the policy is also to protect land used for sport; playing fields and sports facilities which is welcomed by Sport England. Sport England considers that the actual policy wording under 1a could benefit from additional wording which places emphasis on the use of a robust evidence base or assessment to support the position that the “land is no longer needed as open space”.</p> <p>The policy seems to be based on the requirements for demonstrating a surplus of provision, such that a loss can be justified. However, it doesn’t refer to the other parts of para 99 of the NPPF which permit the loss of land used for sport in the following circumstances:</p> <ul style="list-style-type: none"> • b) the loss resulting from the proposed development would be replaced by equivalent or better provision in

	<p>terms of quantity and quality in a suitable location; or</p> <ul style="list-style-type: none"> • c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <p>Sport England considers that these elements of NPPF para 99 should be addressed within the policy.</p> <p>Sport England welcomes the acknowledgement that the Council lacks an up to date and robust assessment of its playing pitch needs in the form of a Playing Pitch Strategy (PPS). A PPS will help to demonstrate compliance with para 98 of the NPPF, which sets out:</p> <p><i>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.</i></p> <p><i>Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</i></p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/333</p>
<p>Respondent ID</p>	<p>17373345</p>
<p>Respondent Name</p>	<p>Sport England (Mr Owen Neal)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy ID6: Open Space in New Developments</p>
<p>Do you consider this section of the document is</p>	

Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID6: Open Space in New Developments</p> <p>Sport England cannot support the approach advanced within the policy which is based on providing recreation and park space (which includes playing pitches) based on a standard per head of population. This is contrary to Sport England's policy which advocates the use of a robust assessment of the area's quantitative and qualitative sports pitch needs in accordance with para 98 of the NPPF to determine the quantum of sports provision to meet the needs for sport arising from new development. Sport England has produced the Playing Pitch Calculator which when used in conjunction with the PPS, can help to predict the level and type of new pitch provision needed to meet future generations</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/197
Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy H7: Review Mechanisms – object (ineffective, unjustified and inconsistent with national guidance)

3.3. Part 1) of the draft policy states that “If a reduced contribution to affordable housing than that which is required by the Local Plan is proposed and justified on viability grounds, the Council will, where it considers appropriate, require a viability review mechanism to be secured”.

3.4. St Edward supports the delivery of affordable homes in compliance with up to date planning policy. In some instances the delivery of affordable housing as part of a development can be reduced because of the viability of the development. Policy H2 of the LPSS accommodates this, provided the planning application is supported by a viability appraisal.

3.5. In these circumstances, detailed viability appraisals would need to be submitted, reviewed and verified by an appropriately qualified specialist on behalf of the LPA. Where it is accepted that a policy compliant level of affordable is not viable, a viable level of affordable housing would then be agreed between parties.

3.6. It is accepted that because development costs and values change over time, the outcome of an assessment at a point in time can also change. However, it is not clear in the LPDMP as to the circumstances whereby late stage reviews would be appropriate.

3.7. GBC should provide evidence to show whether late stage reviews do generally result in additional contributions being obtained and whether the characteristics of the development allocated / likely to come forward in compliance with the LPSS, would be of the type that would be appropriate for late stage reviews.

3.8. A late stage review would result in additional consultant costs to applicants after planning permission is granted. The risk that an additional and unknown level of contribution could be sought following planning permission creates uncertainty. This could jeopardise the delivery of development and the willingness to proceed on developments where there are known high development and infrastructure costs.

3.9. The national guidance on viability (Planning Practice Guidance - Gov.Uk) Paragraph: 009 Reference ID: 10-009-20190509 states (author emphasis):

Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.

3.10. St Edward consider that the draft policy does not follow the guidance on the following grounds:

1. The draft policy says it will seek review mechanisms where the council considers it appropriate; this is not specific and open to interpretation; and

2. Neither the policy or the supporting text sets out a clear process and terms of engagement regarding how the viability would be reassessed over the lifetime of the development.

3.11. In terms of the first point, the policy can be improved by including criteria as to when late stage viability review would be inappropriate.

3.12. Paragraph 2.33 of the supporting text of the draft policy, does recognise that there may be certain developments where the potential for additional contributions is likely to be limited by the circumstances of the case. St Edward consider that the policy should provide specific criteria or examples where this would be the case.

3.13. If the policy is not improved in this way, then determining whether a late stage review process is appropriate and secured as part of a planning permission would be a subjective decision, which could be a matter for protracted dispute and uncertainty for the applicant during the planning application stage.

3.14. In respect of St Edward's interest, the North Street Regeneration site is specifically identified under Policy A5 in the Local Plan: Strategy and Sites as an important area for regeneration in Guildford Town Centre. Policy A5 includes a number of requirements that are important for the success of the redevelopment and its contribution to the prosperity and vitality of Guildford. These requirements include:

- **High quality design to reflect the surrounding historic** environment and qualities of Guildford Town Centre;
- Enhancement of the historic shopping core; including connectivity and improvements to public realm;
- New Bus interchange facilities; and
- Mitigation measures to accommodate travel demand (and to promote modal shift away from the car) and changes to the town centre network for private traffic, deliveries and buses

3.15. These requirements represent significant improvements to important facilities within the town centre, including new public realm, new bus interchange, pedestrianisation, highways works and more.

3.16. These enhancements will be at significant development cost, as well as the enabling costs associated with a brownfield site within the town centre.

3.17. For these reasons and because of the nature and type of the infrastructure requirements of the St Edward Homes Ltd February 2022 6 redevelopment it is high risk site from a development point of view. As such, it is one of the circumstances whereby a late stage viability review process would be inappropriate as it increases the risk on the already high-risk site, which could prevent the development from proceeding.

3.18. It is also apparent that the potential for surplus funds during the lifetime of the development is likely to be limited. This is reflected in Local Plan Local Plan: Development Management Policies & Stage 1 Community Infrastructure Levy (CIL) Viability Assessment December 2021 by Dixon Searle Partnership, which states at paragraph 3.4.11 that previously undertaken appraisal work has demonstrated those sites [North Street] to be challenged in terms of viability.

3.19. St Edward are a responsible developer committed to the delivery of affordable housing, where it can be accommodated within a proposal. At the time of application submission and if necessary, a viability assessment will be prepared and submitted in order to suggest a viable affordable housing provision on the Site taking into consideration a number of factors, notably the capital directed to public improvements and the remediation and delivery of a scheme on a brownfield site. This is in line with the objectives of the NPPF, which promotes the development of brownfield site first, noting this can be at the expense of affordable housing delivery (Paragraph 64).

3.20. A late stage review requirement would be significant risk to the development finances which may affect the delivery of this Site, including all of the wider public benefits and much needed new homes. Given the number of factors at play on this Site, it makes most sense for the position to be agreed at the time of determination of the application, so it is certain the Site can viably be delivered over its lifetime, without the risk of additional costs later in the programme.

3.21. Furthermore, in order to achieve an acceptable margin on schemes that would not otherwise be viable, developers rely to some extent on growth in the market. A mechanism built to share this uplift therefore introduces further risk. Such mechanisms also limit the ability to finance the development which can prevent it proceeding at all, or increase finance costs, further impacting on viability.

3.22. On this basis, St Edward seek an amendment to the policy to include text excluding Policy A5 from the requirements of Policy H7. This is an allocated site, which has been subject to many development proposals over the years, which have not materialised. However, it is St Edward's firm intention to deliver the Site, and regenerate this largely derelict brownfield site in a prime location in the centre of Guildford. This exclusion could be written into the policy or included within the supporting text.

3.23. As an alternative, if this is not accepted, St Edwards suggest the wording of the policy includes more explanation, detailing how the deferred contribution is to be calculated. Paragraph 2.40 of the supporting text of draft Policy H7 only refers to development value and build costs, which is considered to be too simplistic.

3.24. It is important that calculations take account of any deficit that schemes may be in at the outset, and not just any uplifts in value and build costs. Otherwise, the developer may be required to pay a contribution before the scheme has reached a viable position.

3.25. The calculation should also take account of the uplift in all relevant costs, not just build cost. Otherwise, this could mean that a developer could be liable for a contribution when a scheme remains unviable as uplifts in other costs, such as financing, are not taken into account.

3.26. On this basis, St Edward consider that any review should comprise a full review of the viability using the same methodology as the original viability appraisal submitted with the planning application. The findings of the two appraisals should then be compared to identify whether the viability of the development has improved and it is

	<p>reasonable to require any financial contributions towards affordable housing provision.</p> <p>3.27. Overall, whilst GBC may deem this to be an appropriate policy, and decide it should remain, St. Edward request that <u>development relating to the delivery of Policy A5</u> is excluded from the requirement of Policy H7, because of the significant additional risk that it would impose and the risk that it could prevent the development from proceeding. Alternatively, should GBC not consider this appropriate, then the policy must include detailed information as to how and when the review calculation will be undertaken. This to ensure that the policy meets all of the tests of soundness in paragraph 35 of the NPPF.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/198
Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy H8: First Homes – object (ineffective and not positively prepared)

	<p>3.28. St Edward are supportive of the overall objectives of this policy and supports the goals within National Guidance on this topic. However, they raise a few concerns with the policy as worded as it is not positively prepared and could be made clearer.</p> <p>3.29. Some brownfield sites which are compelled by policy to deliver new infrastructure have viability justification as to why they are unable to provide a policy compliant level of affordable housing. A line should be added to the policy to clarify this. The policy should be amended to include the following (additional text in red):</p> <p><i>1) A minimum of 25% of affordable homes provided either on-site or off-site or as a financial contribution in lieu of on-site provision in line with the Council's adopted affordable housing requirements are required to be First Homes, unless a developer demonstrates that providing the amount of affordable housing required by Policy H2 would not be viable nor feasible for some other reason. In these cases, the provision of First Homes, if feasible, will be proportionate to the total amount of affordable housing provided.</i></p> <p>3.30. Overall, the inclusion of St Edward's suggested wording ensures that the policy is positively prepared, clear and consistent with GBC's Policy H2 of the adopted local plan. It is effective, as it avoids constraining the delivery of affordable homes.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/199</p>
<p>Respondent ID</p>	<p>38188033</p>
<p>Respondent Name</p>	<p>St Edward Homes Ltd</p>
<p>Agent Name</p>	<p>Savills Planning (Robert Steele)</p>
<p>Section</p>	<p>Policy P6/P7: Biodiversity in New Developments</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy P6/P7: Biodiversity in New Developments – object / unjustified and not consistent with national guidance

3.31. St Edward object to this policy as presently worded as it is not justified or consistent with national policy as per paragraph 35 of the NPPF, however they support the overall objectives of this policy.

3.32. Policy stipulates that “12) Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 per cent”. Firstly, “qualifying development” is not defined in the policy or support text.

3.33. The draft policy requires at least 20% BNG to be achieved for qualifying development. This is double the minimum requirement of the Environment Act 2021, which is 10%. Whilst the minimum requirement in the Act may change over time, there is no detailed justification in the DMP for GBC to require at least 20% BNG on qualifying development now / on its adoption.

3.34. How the BNG in the Environment Act is to be implemented and secure is still under review. At the time of writing there is a transition period to 2023 until the minimum BNG of 10% is required for every relevant development. This transition period allows mechanisms and procedures to be created to enable BNG to be quantified and secured, and also ensures the development industry has the time to adapt and plan their sites and interests accordingly.

3.35. GBC’s proposal to double to minimum requirement to 20% independent of the novel national initiative could undermine the delivery of development sites, and therefore BNG.

3.36. No evidence has been provided to demonstrate that the Borough is in need of enhanced biodiversity gains on the scale proposed, and so the policy should be tied to the requirements of the Environment Act, or other national standard that maybe applied in the future. This would help developers plan strategically and provide certainty, which in turn facilitates the fast delivery of new homes and regeneration.

	<p>3.37. In order to address the issues indicated above, St Edward suggest that the policy is amended in the following way (strikethrough is suggested deletion and red indicated additional text):</p> <p><i>“12) Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 <u>10</u> per cent, or as per the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology”.</i></p> <p>3.38. These changes would make the policy consistent with national guidance and legislation and reflects what is justified in a local context.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/200</p>
<p>Respondent ID</p>	<p>38188033</p>
<p>Respondent Name</p>	<p>St Edward Homes Ltd</p>
<p>Agent Name</p>	<p>Savills Planning (Robert Steele)</p>
<p>Section</p>	<p>Policy P10: Land Affected by Contamination</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is Sound?</p>	
<p>Do you consider this section of the document complies with the Duty to cooperate?</p>	

Comment	<p>Policy P10: Land Affected by Contamination – object (ineffective and unjustified)</p> <p>3.39. This policy requires significant information and detail to be submitted with planning applications, which in many cases could reasonably be secured by condition instead. The inclusion of this policy, compels a developer, who may only be submitting an Outline / ‘Hybrid’ planning application, to undertake a lot of costly and potentially invasive work at risk when a decision regarding the planning application has not yet been made.</p> <p>3.40. Furthermore, it may be appropriate for further surveying to be undertaken to finalise mitigation / remediation following the grant of planning permission.</p> <p>3.41. St Edward support the requirement of ensuring contamination is dealt with appropriately for public health and environmental purposes. However, the necessity of the policy is questioned, as GBC have the ability to include the requirements of the policy in their validation list. GBC would also have the ability to use planning conditions for some of the relevant requirements of the policy too.</p> <p>3.42. The policy is not necessary. If the policy is retained it should be amended to include reference to the use of planning conditions to secure the investigation works / assessments, where appropriate.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/201
Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness – object (ineffective and not positively prepared)

3.43. St Edward is a high quality developer and good urban design is important to its brand and place making. They are committed to a design process and pre-application discussions with Local Planning Authorities to achieve this aim. However, it is considered that the proposed Policy D4 of the LPDMP repeats design guidance which is already available and a material considerations in the LPSS, various Supplementary Planning Documents and national guidance.

3.44. Policy D1 in the LPSS ensures a comprehensive design process for development in the Borough, and it is not considered necessary for further commentary or guidance in this respect.

3.45. Additional design based policy has the potential to contradict other planning policy, can become a hindrance that complicates the design process and the determination of planning applications. Both the LPSS Policy D1 (in addition to the National Design Guide and National Design Code which are already material considerations) will need to be considered for planning applications in the Borough.

3.46. On this basis, St Edward question the need for another policy (i.e. draft Policy D4 of the LPDMP) addressing the same topic. The policy repeats guidance in the National Design Guide and so GBC should justify this repetition and duplication, otherwise it is inconsistent with paragraph 16e) of the NPPF which seeks to avoid unnecessary duplication.

3.47. It is noted that the Policy D4 contained in the Regulation 18 of the LPDMP regarding Housing Density has been deleted and not replaced. This policy recognised that sites within the town centre are appropriate for higher density development. In accordance with the Paragraphs 124 and 125 of the NPPF the following amendments for Policy D4 are suggested, in the event the policy is retained:

6) Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting. In town centres higher densities shall be supported

3.48. In summary, St Edward consider that the relevant policies in the LPSS 2019, NPPF, National Design Guide and Planning Practice Guidance, is sufficient for decision making purposes in respect of urban design. There is no absence in local policy, which prevents GBC securing high quality design within the Borough. It is important that the best use of land is made, notably in the most accessible locations, in the context of the wider NPPF / LPSS priorities to safeguard as much as Green Belt as possible, and also the countryside / AONB in general. To assist effective decision making, a positive intent is required to encourage higher density (and where appropriate taller) development.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/202

Respondent ID

38188033

Respondent Name

St Edward Homes Ltd

Agent Name

Savills Planning (Robert Steele)

Section

Policy D5: Protection of Amenity and Provision of Amenity Space

Do you consider this section of the document is Legally Compliant?

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

<p>Comment</p>	<p>Policy D5: Protection of Amenity and Provision of Amenity Spaces – object (ineffective)</p> <p>3.49. St Edward aim to create high quality places, which incorporate useable and welcoming amenity spaces. St Edward supports the objective of Policy D5, however the policy should be flexible to ensure developments in urban environments can be delivered using the best use of land despite any constraints.</p> <p>3.50. St Edward suggest that the wording of this policy includes flexibility, particularly where this is already sufficient public amenity space nearby or where public realm improvements are proposed by a development.</p> <p>“2) All new build residential development proposals, including flatted development, are expected should aim to have direct access to an area of private outdoor amenity space, where appropriate. In When providing appropriate outdoor amenity space, both private and shared, development proposals are required to:</p> <p>a) take into account consider where possible the orientation of the amenity space in relation to the sun at different times of the year”.</p> <p>3.51. In summary, this is an effective measure, as it allows for a fair and contextual provision of private and public amenity spaces.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/203</p>
<p>Respondent ID</p>	<p>38188033</p>
<p>Respondent Name</p>	<p>St Edward Homes Ltd</p>
<p>Agent Name</p>	<p>Savills Planning (Robert Steele)</p>
<p>Section</p>	<p>Policy D9: Residential Infill Development</p>
<p>Do you consider this section of the document is</p>	

Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D9: Residential Infill Development Proposals – object (ineffective)</p> <p>3.52. As per the definition in paragraph 5.91 of the LPDMP infill development <i>“includes any new residential development of a vacant site or the redevelopment of a developed site. It includes residential development within a garden. For the avoidance of doubt this does not carry the same definition as ‘limited infilling’ for Green Belt purposes.”</i> Therefore this policy should be aimed at infill development only and not confuse this with development concerning larger-scale, allocated sites. This should be made clearer in the policy or as part of the Glossary so that there is no confusion.</p> <p>3.53. Whilst St Edward understand the importance of comprehensive masterplanning and ensuring that sites, where there are separate landownerships, do not prejudice the separate land parcels, there are other policies in the LPSS and LPDMP in place, such as those relating to design which cover this issue.</p> <p>3.54. St Edward suggest the following amends to the policy, indicated in red and strikethrough:</p> <p>“2) Piecemeal development proposals will be resisted. Where the Council considers that land has come forward which has been artificially subdivided, it will require appropriate infrastructure contributions commensurate with what would have been required on the larger site. Contributions will be based on a level of development across the comprehensive area which the Council considers appropriate.”</p> <p>3.55. In addition, the following should be added to the supporting text definitions (additional text in red):</p> <p>“5.94 Piecemeal development - in the context of this policy relates to <u>small-scale</u> uncoordinated development where individual applications are submitted for development across a larger developable area.”</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/204
Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets; Policy D17 Listed Buildings; Policy D18 Conservation Areas; Policy D19 Scheduled Monuments; D19a Registered Parks and Gardens; D20 Non Designated Heritage Assets - object (ineffective)</p> <p>3.1. As has been mentioned in this representation, it is clear that local policies should avoid unnecessary duplication of policies and guidance. The NPPF, in Chapters 15 and 16, provides clear and legible guidance on how to approach heritage matters, how to balance harm and how a decision maker should assess proposals that cause harm. Policy D3 of the LPSS already addresses heritage matters.</p> <p>3.2. Proposed policies D16, D17, D18, D19, D19a and D20 do not add anything over and above what is required for decision making in national guidance and relevant legislation concerning Conservation Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p>

	<p>3.3. If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.</p> <p>3.4. St Edward suggests that an effective measure would be to simply consider a single additional heritage policy, only where this would add anything locally distinctive or necessary to the LPSS, PPG and NPPF.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/205
Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy ID11 Parking – comment</p> <p>3.5. Please see St Edward’s comments on the draft Parking SPD (2022) consultation which are also relevant to the proposed Policy ID11.</p>
What changes do you suggest should be made	

to the document?	
Files	
Comment ID	LPDM21B/403
Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>Residents who live in city/ town centres in apartment developments typically own smaller vehicles (as opposed to the larger vehicles evidenced in the Parking SPD). It is suggested that the Parking SPD (and Policy ID11 of the proposed LPDMP) includes some flexibility to allow 2.4m X 4.8m spaces to be incorporated into schemes where it can be justified on a case by case basis. Such as for urban apartment developments with basement parking.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/404

Respondent ID	38188033
Respondent Name	St Edward Homes Ltd
Agent Name	Savills Planning (Robert Steele)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>There is no need for every space to have a charging point (or the enabling infrastructure). St Edward propose that similar standards are adopted to those in the Surrey County Council Electric Vehicle Strategy 2018 for flatted developments. This would include 20% of spaces to have fast charge connections and a further 20% passive (i.e. with enabling infrastructure). This is particularly suitable for unallocated parking provision.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/411
Respondent ID	10798049
Respondent Name	Steve Knight
Agent Name	
Section	Policy ID11: Parking Standards

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>Impractical objective to hope individuals will abandon their cars in favour of bicycles and/public transport therefore the level of residential car parking provision too low.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/382
Respondent ID	19097313
Respondent Name	Surrey County Council (Mr James Greene)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

<p>Comment</p>	<p>Our comments are below with text added in red and struck through.</p> <p>p.56, Policy P4, point 2</p> <p>Development in areas at medium or high risk of all sources of flooding, as identified on the latest Environment Agency flood risk maps and the Council’s Strategic Flood Risk Assessment.</p> <p>Point 5</p> <p>All development proposals are required to demonstrate that land drainage will be an adequate surface water drainage system is provided to meet current guidance and that they there will not result in an be no increase in surface water run-off. Proposals should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study.</p> <p>Paragraph 4.3.46</p> <p>Development should follow the surface water drainage hierarchy as set out in Part H of the Building Regulations (Approved Document H - Drainage and Waste Disposal (2015 edition)). Drainage systems higher in the SuDS hierarchy, as defined by NPPG, will be favoured. However, To ensure effective use over their design life-course, the Council will require appropriate funding to implement evidence of the management and maintenance requirements for any proposed surface water drainage mechanism or other system of water management-system will be required. Applicants should also demonstrate that they have taken into account relevant recommendations of the Guildford Surface Water Management Plan or Ash Surface Water Study.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/336</p>
<p>Respondent ID</p>	<p>19097313</p>
<p>Respondent Name</p>	<p>Surrey County Council (Mr James Greene)</p>

Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Electric Vehicle Charging Points</p> <p>Any mention of electric vehicle charging points should be changed to include the minimum standard of fast-charge points. Our transport policy team have advised that the current minimum requirements are for a 7kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/393
Respondent ID	19097313
Respondent Name	Surrey County Council (Mr James Greene)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>[A response to the draft Parking SPD consultation which covers policy matters]</p> <p>We note that for planning applications at non-strategic sites, Neighbourhood Plans, which are likely to contain minimum parking standards, will be given weight where they exist. We would like to support the implementing of ‘Maximum Provisions’ as set out in Policy ID11 for all sites across the borough, not just those that are strategic.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/3
Respondent ID	8567137
Respondent Name	Surrey Gardens Trust (Mr Don Josey)
Agent Name	
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	On behalf of the Surrey Gardens Trust I write to confirm support for Policies D16, D19a and D20 as now presented following the earlier consultation.
What changes do you suggest should be made to the document?	One tiny correction is still needed to Table D16a where the number of Registered Parks and Gardens is given as "10" rather than the correct number "8" as confirmed at Para 5.375.
Files	
Comment ID	LPDM21B/1
Respondent ID	8567137
Respondent Name	Surrey Gardens Trust (Mr Don Josey)
Agent Name	
Section	Policy D19a: Registered Parks and Gardens
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	On behalf of the Surrey Gardens Trust I write to confirm support for Policies D16, D19a and D20 as now presented following the earlier consultation.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/2
Respondent ID	8567137
Respondent Name	Surrey Gardens Trust (Mr Don Josey)
Agent Name	
Section	Policy D20: Non-designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	On behalf of the Surrey Gardens Trust I write to confirm support for Policies D16, D19a and D20 as now presented following the earlier consultation.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/58
Respondent ID	38134849
Respondent Name	Surrey Hants Borders Branch CAMRA (Dave Taylor)
Agent Name	
Section	Policy ID9: Retention of Public Houses
Do you consider this section of the document is Legally Compliant?	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

I am writing on behalf of the Surrey Hants Borders Branch of CAMRA – the Campaign for Real Ale in support of Policy ID9 relating to the Retention of Public Houses.

We have approximately 350 members living in the Guildford Borough area and have a concern for the protection of local Public Houses, particularly those that are of value to the local community.

The 2012 National Planning Policy Framework recognised the value of pubs as both community and heritage assets and helps to guard against the loss of valued community pubs. CAMRA is unsurprisingly very keen for local planning authorities to adopt Local Plan policies that reflect and build on those from national level. To this end I am delighted that Guildford Borough Council has chosen to include a specific policy within the Local Plan to support pubs and would like to commend you for doing so.

I am strongly supportive of Policy ID9, but would like to make some suggestions in relation to the supporting text and justification:

Thank you once again for the opportunity to comment on the draft plan and I hope you are able to amend the supporting text along the lines suggested above. If you require any further clarification on any of the points, please don't hesitate to contact me.

What changes do you suggest should be made to the document?

- It would help if it was clear that this policy applies to both closed public houses as well as those that are currently trading. I would suggest it explicitly states that pubs that have been closed in the last 5-years are covered by this policy.
- With respect to viability it is suggested that wording is included in the justification to the effect that applicants be asked to provide evidence in the form of trading accounts for the last three years in which the business was operating as a full-time business. Furthermore, this should be a requirement for public houses both within the town centre and throughout the rest of the Borough.

	<ul style="list-style-type: none"> • Furthermore with respect to all evidence submitted it is suggested that text is added to confirm that procedures to ensure that submitted evidence is properly scrutinised. If the Council does not have the resources to carry this out in house a requirement on the applicant to cover the costs of such scrutiny should be considered for inclusion. • With respect to reasonable walking distance, it is suggested that the explanatory text clarifies that 800m should be the distance which a customer should be required to walk to an alternative facility, rather than an 800m radius. There are instances where a public house may be geographically close by, but roads or rivers act as barriers, make the distance needed to travel to reach it significantly longer.
Files	
Comment ID	LPDM21B/259
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy H7: Review Mechanisms
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H7: Review Mechanisms: The evidence base prepared by Dixon Searle is noted re: viability. TW reserves its position, for any necessary comment on this evidence base in light of the progress on discussions on Wisley Airfield, the approach to affordable housing and infrastructure delivery.</p> <p>Policy H7: Review Mechanisms - Comment</p>

	<p>3.5. TW does not wish to comment specifically on policy H7 review mechanism, as at the present time, the planning application at Wisley Airfield will seek to provide a policy-complaint level of affordable housing (40%).</p> <p>3.6. However, in respect of wider issues of viability, Dixon Seale has completed a Development Management Policies & Stage 1 Community Infrastructure Levy (CIL) Viability Assessment (December 2021) on behalf of GBC. This document has been prepared as a part of a wider evidence base gathering exercise on viability, informing the review of the local plan. It is understood it will supersede some of the policies in the Local Plan 2003. At this stage (Stage 1 in respect of CIL viability considerations) the assessment initially scopes the potential for a Guildford Borough CIL by using a wide range of test charging ('trial') rates at up to £500/sq. m (per square metre) – the work also includes various assumptions on Wisley (Allocation A35), which require input from TW as the lead delivery stakeholder.</p> <p>3.7. TW reserve the right to comment on the CIL regulations and draft CIL charging schedule further, though at this time, TW would wish to prepare any required further evidence of viability / infrastructure delivery should the Dixon Searle evidence be debated at Examination, relevant to Policies H7 and H8. This is relevant in respect of the overall cost burden of planning gain in addition to affordable housing, and all relevant for Section 106.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/262
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is	

Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

• **Policy H8:** First Homes: the homes are required to be no higher than £250,000 which will lead to a high proportion of 1 bed units. This should be adapted to ensure that there is flexibility allow for the scenario where there is no demand for the likely 1 bed first homes.

-

Policy H8: First Homes – Object

3.8. TW support the principle of First Homes, however they have some comments on the policy has worded. **In its present form it is not effective or positively prepared.**

3.9. As per paragraph 2.47, all of the initial sales after discount must be under £250,000, thus this is likely to result in a high number of one beds. If circa 25% of the affordable units were one beds, this would result in a high proportion of one bed units on larger strategic site. For example, a 2,000 unit scheme would have 200 one bed units if the affordable provision was 40%. It is possible there will not be demand for this level of one beds and in this instance, there should be a way to vary the percentage of one beds on future phases and increase the number of 2-3 bed units in lieu of first homes. Such a review mechanism could be added to policy H7 or the supporting text, and would allow for an appropriate scheme for the provision of affordable housing including First Homes, to be negotiated and agreed via Section 106.

3.10. It is suggested that paragraph 2.47 is update 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..”

What changes do you suggest should be made to the document?

Files

Comment ID	LPDM21B/263
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P6/P7: Biodiversity in New Developments: adaptations to make the policy clearer and more robust, better aligned with National guidance, and ensuring the policy has realistic expectations for developments in the borough.</p> <p>Policy P6/P7: Biodiversity in New Developments – Object</p> <p>3.11. TW support the overall objectives of this policy, however, they seek a few changes. As presently worded, this policy is not justified or consistent with national policy as per paragraph 35 of the NPPF.</p> <p>3.12. TW seek the following amendments to ensure the policy is clear and justified, as per Paragraph 35 of the NPPF (2019) (strikethrough wording should be removed and red text should be added):</p> <p><i>“2) Development proposals within or adjacent to a Biodiversity Opportunity Area (BOA) are required (where feasible) to:”</i></p> <p>3.13. TW remain of the view that the phrase ‘where feasible’ should be added to the wording of this policy because not every development will be able to achieve everything that is sought within the policy wording, In particular 2b), the requirement to both protect and enhance habitats and species within an area of land that may be outside of their</p>

control. TW note GBC's response to the Regulation 18 consultation comments: *"the planning process allows flexibility where the outcomes sought by policy are not possible."* However for policies to be positively prepared they must be clear and realistically capable of being achieved. If the possibility that certain aspects of policies may not be achievable, recognising that policy wording in itself can be open to interpretation, then flexibility should be factored into the wording to ensure that developments are not unduly penalised for failure to achieve the impossible. If GBC insists that TW's suggested addition is not required, then clarification should be added to the supporting text to explain the following, as per GBC's response to the Regulation 18 consultation policy (changes in red and deletions in strikethrough):

"The protection and enhancement of habitats and species within a BOA can include the improvement of biodiversity habitats within adjacent land, which can serve to improve the condition and connectivity of habitats within the BOA and in turn the species supported, without the need to deliver habitat works within the BOA land itself."

3.14. Policy stipulates that:

"12) Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 per cent".

3.15. A requirement of at least 20% BNG is greater than that required by the Environment Act, which states a requirement of 10%. Although GBC has explained in the revised supporting text that this figure has been selected to reflect the fact that Surrey has suffered worse biodiversity declines than the country as a whole, no evidence or reasoned justification is presented as to why a specific stated percentage that is double that stated in the Environment Bill has been arrived at.

3.16. GBC states that the higher figure provides greater certainty that a genuine net gain will be achieved, however TW disagrees with this assertion for two reasons:

- First, introducing 20% as a minimum is likely to be an onerous requirement for many developers, and it therefore has the potential to jeopardise the delivery of housing on allocated sites under the Part 1 Plan (Guildford Local Plan (2019)). At the time of adoption of this Plan, there was no specific requirement for net gain, and therefore the Plan and its allocations were found sound on the basis that allocations would need to follow National standards. Strategic developments have the potential to make some of the most significant contributions to BNG within the borough, such that aiming too high on BNG targets may frustrate development and the delivery of BNG targets altogether.

• Second, and when combined with the pressures on development viability cited above, a target of 20% BNG that is well above the National standard is likely to introduce an overly simplistic and unhelpful focus on the quantitative ‘bottom line’. This has the potential to result in a decision making process that becomes a slave to the metric, which in turn is likely to further encourage the design of developments that go for the ‘quick wins’ rather than those that seek to incorporate locally appropriate and ambitious BNG targets which in qualitative terms support BOA aims and objectives, amongst other nature recovery aspirations. It is, for example, far easier to achieve increases in calculated BNG units through the creation of bramble scrub than it is to create acid grassland or heathland, however the latter is likely to achieve much more meaningful long-term biodiversity gains.

3.17. In summary, TW objects to this policy on the basis that the specific elevated BNG requirement above the national standard is not adequately justified, that it has the potential to undermine the viability of strategic developments that are likely to be capable of securing significant biodiversity gains within the borough, and that it introduces an unhelpful focus on quantitative as opposed to qualitative ecological assessment, such that the overall aim of the policy – achieving genuine net gain – is likely to be frustrated.

3.18. Upon publishing the metric calculation tool, Defra and Natural England made it clear that it was intended to be used as a tool to inform discussions with the LPA, not replace them. Indeed, the User Guide for Version 3.0 (the most current at the time of writing) acknowledges the limitations of the metric stating that *“The metric uses habitats as a proxy for biodiversity. Although this is a rational means of measuring biodiversity value, it is a simplification of the ‘real world’. (...) the metric and its outputs should therefore be interpreted, alongside ecological expertise and common sense, as an element of the evidence that informs plans and decisions. The metric is not a total solution to biodiversity decisions”*.

3.19. TW’s view is therefore that the decision making process should recognise and support well designed schemes that take account of detailed site-specific ecological evidence, considering both quantitative BNG as assessed via the metric but also qualitative BNG set out within an ecological impact assessment.

3.20. The Defra Metric User Guide acknowledges that *“Protected and locally important species’ needs are not considered through the metric”*. This could apply, for example, to features such as reptile hibernacula or bat boxes designed for species that have been recorded in the area. Therefore in many instances there will be significant qualitative biodiversity gains that go above and beyond the stated BNG percentage score.

	<p>3.21. TW’s view is therefore that the policy should be amended to require policy (changes in red and deletions in strikethrough):</p> <p>“12) Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 per cent, or the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology. Biodiversity net gain should be demonstrated by exceeding the national minimum amount in either quantitative and/or qualitative terms, evaluated on the basis of both the Defra metric output and robust ecological impact assessment undertaken in accordance with industry guidance (e.g. CIEEM’s EcIA guidelines, 2019), and taking account of site-specific circumstances including viability”.</p> <p>3.22. Overall, this policy needs rewording in line with the suggestions above to ensure that is in line with national policy and justified. At present the policy wording and supporting text fails to meet the tests in paragraph 35 of the NPPF, and in TW’s opinion is unlikely to be found sound by an Inspector without amendment.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/264
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy P8/P9: Protecting Important Habitats and Species: overall, TW’s view is that elements of the current policy wording and supporting text have the potential to result in the incorrect evaluation of irreplaceable habitats, the incorrect application of biodiversity policy, which in turn has the potential to significantly constrain the delivery of sustainable development within the borough. On this basis the policy is not justifies or consistent with national policy

Policy P8/P9: Protecting Important Habitats and Species – Object

3.23. TW support the overarching principles of this policy, although raise a number of concerns with this policy as presently worded. **As worded the policies are ineffective.**

3.24. It will not always be possible to enhance ecological features on land adjacent to a development site which are outside of the applicant’s control. On this basis, TW pose the following changes to the policy (changes in red and deletions in strikethrough):

“1) Development proposals for sites that contain or are adjacent to irreplaceable habitats, priority habitats, habitats hosting priority species, sites designated for their biodiversity value and all aquatic habitats are required to preserve the relevant ecological features through the application of the mitigation hierarchy, and where possible ~~to~~ deliver enhancements to the ecological features in line with Policy P6/P7.”

3.25. If GBC insist that the suggested addition is not required, because, as per their Regulation 18 response *“there may be measures on the site that can enhance those habitats, such as provision of a semi-natural buffer that helps species dispersal or connectivity, or provision of complementary habitat that improves the health of the irreplaceable habitat.”*, then this should be clearly explained in the supporting text to aid the interpretation of policy wording.

3.26. In terms of 3) within the policy, being listed on an inventory does not automatically mean something is irreplaceable. The supporting text claims in paragraph 4.68 that the Surrey’s Revised Ancient Woodland Inventory 2011 (RAWI) *“provides a well-documented and consistent approach to establish whether land is ancient woodland”*, but the revision was an entirely desk-based exercise and the 2011 document is clear that woodland identified as ancient is only done so on a provisional basis (see para 3.2.7, page 33). It does not therefore ‘clearly establish whether

land is ancient woodland’ and is therefore ‘irreplaceable’.

3.27. TW’s view is that there should always be scope for review of relevant evidence in interpreting whether a habitat is truly irreplaceable, as defined by the NPPF. Satisfaction of the NPPF definition should be the acid test, not inclusion on provisional inventories or other strategies that have not been subject to independent scrutiny as part of an examination. The potential for erroneous and subjective interpretation of the ecological importance of land that is not founded upon sound site-specific evidence can otherwise precipitate through the planning system. The supporting text states that challenges to the RAWI should be made before an application is submitted, with the RAWI amended. The RAWI challenge process is protracted and fraught with uncertainty, therefore there should always be scope to consider primary evidence contained within an ecological assessment as part of a fair and transparent decision-making process.

3.28. Ultimately, TW supports the first part of part 3) to the first comma, but Local Nature Recovery Strategy (LNRS) and inventory should be seen as a guide, not to pre-determine the outcome of detailed, site-specific, evidence-led ecological assessment. On this basis TW propose the following changes:

“3) A habitat will be considered to be irreplaceable if it meets the definition in the NPPF glossary or guidance issued by the Surrey Nature Partnership, in addition or if it is identified as irreplaceable in the Local Nature Recovery Strategy, or it is on land identified in an established inventory, such as the Revised Ancient Woodland Inventory (RAWI), should be seen as a guide to inform the assessment of potentially important ecological features.”

3.29. The supporting text sets out the NPPF definition of ‘irreplaceable habitats’ but the text goes on to wrongly conflate truly ancient irreplaceable hedgerow habitat with ‘important’ hedgerows, as per the GOV.UK definition. This definition of ‘important’ hedgerows derives from The Hedgerow Regulations 1997, which is intended to protect hedgerows in the context of land management practices that are not governed by the planning system. The definition of ‘important’ hedgerows under the Hedgerow Regulations does not provide a robust and reliable means of defining irreplaceable habitat, and GBC’s proposed approach serves to conflate the value of the *underlying* vegetation, including its historic importance, with its role in supporting protected species which may be common and widespread in a given site or location and are in any event required to be protected through other elements of the policy as well as legislation. All of the other criteria outlined by GOV.UK regarding important hedgerows are arguably more relevant than the 30 year age and protected species/rare species criteria. For example, a hedgerow only 30 years old supporting a common species of bat or reptile (both species listed on the Wildlife and Countryside Act) would certainly not be

“technically difficult or take a very significant time to replace”, and would therefore not be consistent with the NPPF definition for an irreplaceable habitat. TW request that the supporting text (paragraph 4.66g) is altered to state that ancient hedgerows are irreplaceable, but that ‘important’ hedgerows, as per the GBC cited definition, should be considered as ‘priority habitat’ as per the former UK BAP, i.e. this part should be deleted from paragraph 4.66g.

3.30. If GBC remains of the view that irreplaceable hedgerow habitats can include habitats of only 30 years of age that support protected / threatened species use, then further clarification is required within the supporting text to define:

a) the schedule(s) of the WCA of relevance (some species are only protected from sale) and

b) the distribution, population size, and other factors influencing the ecological importance of said protected / threatened species, or other factors such as their functional dependence on a hedgerow in question, that might be considered relevant to the interpretation of whether the habitat is truly ‘irreplaceable’. The potential issue is the presence of one occasional grass snake within a hedgerow that is 30 years old, or one sighting of a common pipistrelle bat, should not be sufficient to render a hedgerow irreplaceable and thus essential for retention within a development site.

3.31. If the latter is GBC’s position, this has the potential to very significantly and unduly constrain the positive masterplanning process for suburban and rural schemes, which are already required to assess the potential value of important ecological features, including hedgerows, and to protect and enhance in accordance with the mitigation hierarchy and other elements of GBC policy. The inclusion of ‘important’ hedgerows as per GBC’s suggestion, as ‘irreplaceable’ habitats, therefore undermines the sound basis for ecological impact assessment and the correct application of wider GBC policy, and has the potential to unnecessarily constrain the design and viability of sustainable development.

3.32. Overall, TW’s view is that elements of the current policy wording and supporting text have the potential to result in the incorrect evaluation of irreplaceable habitats, the incorrect application of biodiversity policy, which in turn has the potential to significantly constrain the delivery of sustainable development within the borough. On this basis the policy is not justifies or consistent with national policy.

What changes do you suggest should be made to the document?

Files	
Comment ID	LPDM21B/265
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy P10: Land Affected by Contamination
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P10: Land Affected by Contamination: alterations to the policy to request the requirements can be a condition attached to a decision notice.</p> <p>Policy P10: Land Affected by Contamination – Object</p> <p>3.33. This policy should be reworded as it is not positively prepared or justified as per the NPPF. TW consider that, as worded, the policy requires extensive information on the submission of a planning application, which could otherwise be subject to a condition.</p> <p>3.34. The policy seeks for contamination assessments to be conducted and submitted at the time of the application. It states that (emphasis added in underline):</p> <p><i>1) Development proposals that comprise or include land that is known or suspected to be affected by contamination are <u>required to submit appropriate Site Risk Assessments</u>, which establish the full nature and extent of any land</i></p>

contamination that may adversely affect sensitive receptors, both on-site and in the surrounding area.

2) Where evidence of contamination is identified, an Options Appraisal and Remediation Strategy are required to be submitted, which must demonstrate that the land is to be made fit for its intended purpose, detailing:

a) the appropriate sustainable remediation measures that will be implemented in order to prevent and/or avoid significant harm to sensitive receptors, both on-site and in the surrounding area, including future users of the site; and

b) the appropriate mitigation measures that will be implemented in order to reduce to a minimum any risks presented to the health of sensitive receptors from land contamination...

...4) Where insufficient information is provided, or the relevant reports indicate that there will be an unacceptable adverse impact on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated through appropriate remedial measures, the planning application will be refused.

3.35. It is normal practice for this to be a conditioned upon granting planning permission. TW seek for this policy to be altered to the following if it is preferred that this policy remains in the plan.

“The full nature and extent of contamination is established through suitable assessments; clarifying that site investigations, risk assessment, remediation and associated works are to be carried out to industry best practice guidelines. This should be a condition on the approved decision notice”

3.36. If GBC insist that they wish to keep the detail within this policy, then at the very least TW request that a line is added to the policy so it is clear that this information can be conditioned, detailed on the approved decision notice.

3.37. Overall, TW object to this policy on the basis it act to hinder development being approved as it requests costly works to be completed prior to a planning consent, when in fact it still has the ability to control development by including a pre-commencement condition on the matter.

What changes do you suggest should be made to the document?

Files	
Comment ID	LPDM21B/266
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy P11: Air Quality and Air Quality Management Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P11: Air Quality and Air Quality Management Areas: alterations to the policy to make it appropriate and less onerous.</p> <p>Policy P11: Air Quality and Air Quality Management Areas – Object</p> <p>3.38. TW support the alternative approach of relying on the Local Plan Policies and National guidance, as there is not a specific need to include Policy P11. However should GBC be minded to retain preferred Policy P11, TW have included some suggested amendments below, as presently worded the policy is ineffective and potentially inconsistent with national policy.</p> <p>3.39. Part 1 of the policy says that it “1) <i>Will only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution</i>”. TW suggest this is amended to the below, in order to provide clarity and not to make the policy overly onerous (strikethrough wording should be removed and red text should be added).</p>

	<p><i>“1) Will only permit development where it will not give rise to <u>material or severe</u> adverse impacts on health and quality of life from air pollution”.</i></p> <p>3.40. Part 4 of Policy P11 <i>“4)Requires applicants to demonstrate that appropriate mitigation will be provided to ensure that the new development is appropriate for its location and unacceptable risks are avoided”.</i></p> <p>3.41. <i>“Mitigation”</i> has the potential to be particularly onerous, “avoidance” would be a more appropriate choice of word. On this basis, TW believe that the policy should be amended to:</p> <p><i>“4) Requires applicants to demonstrate that appropriate mitigation <u>avoidance measures</u> will be provided to ensure that the new development is appropriate for its location and unacceptable risks are avoided”.</i></p> <p>3.42. In addition, paragraph 4.126 provides an unrealistic requirement for air quality information during pre-application process. Such information is typically informed by traffic assessments, which typically come together toward the latter stages of application preparation. Air quality information at pre-application might be more realistically based on baseline surveys, and projections based on transport assessment scoping. TW suggest that paragraph 4.126 is <u>deleted</u>.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/267</p>
<p>Respondent ID</p>	<p>20855297</p>
<p>Respondent Name</p>	<p>Taylor Wimpey</p>
<p>Agent Name</p>	<p>Savills (Miss Lucie Beckett)</p>
<p>Section</p>	<p>Policy P12: Water Quality, Waterbodies and Riparian Corridors</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy P12: Water Quality, Waterbodies and Riparian Corridors: altered wording so that the policy is less restrictive and positively prepared.

Policy P12: Water Quality, Waterbodies and Riparian Corridors –Object

3.43. TW generally to not raise any issues with the majority of this policy, however TW request that the wording of clauses 4 to 8 are reworded to ensure that the policy is positively prepared, in line with the requirements of paragraph 35 of the NPPF. **Thus as worded, the policy is ineffective and not positively prepared.** TW seek the following changes to the policy (additional text in red and deletion in strikethrough):

“4) Development proposals ~~are required~~ should seek to explore opportunities to improve and/or restore the flow and functioning of a watercourse.

5) Development proposals are required to retain or reinstate an undeveloped buffer zone on both sides of a main river measuring a minimum of 10 metres from the top of the riverbank that is supported by a working methods statement detailing how the buffer zone will be protected during construction, and a Landscape and Ecological Management Plan detailing how it will be enhanced in the long-term. For ordinary watercourses, an appropriate buffer ~~is expected that~~ is sufficient to protect and enhance the biodiversity and amenity value of the watercourse.

6) Development proposals that include the culverting of watercourses, hard bank revetment or which prevent future opportunities for de-culverting and naturalisation of watercourse banks will not be permitted. Development proposals ~~are expected~~ should seek to return banks to a natural state.

7) Where barriers to fish movement (e.g. weirs) are present in a watercourse, proposals ~~are expected~~ should seek to include the removal of that barrier, or measures to allow for the natural movement of fish within the watercourse where removal is not feasible

	<p>8) Development proposals are required <u>should seek</u> to identify opportunities for Natural Flood Management, creating wetland features and reconnecting rivers with their floodplains in order to restore natural processes, enhance biodiversity and help manage flood risk”.</p> <p>3.44. If GBC make the suggested changes above, the policy will be consistent with the requirements of paragraph 35 in the NPPF and it will ensure the policy is not so restrictive it inhibits development opportunities.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/268
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness: question the need for another policy to address the same issues as Local Plan Policy D1 and the Strategic Development Framework (SDF)

Supplementary Planning Document (SPD) and TW do not feel this policy should be applicable to strategic sites.

Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness – Object

3.45. Policy D1 in the LPSS ensures a comprehensive design process for development in the borough and more specific detail for strategic sites, including an obligation to produce a masterplan that will be subject to assessment by a Design Review Panel. At FWA, the design will be controlled by a Design Code, as required by the Strategic Development Framework (SDF) Supplementary Planning Document (SPD), thus design issues will be fully discussed at a site specific level with GBC and they will be controlled by this Design Code. An illustrative masterplan for all of Policy A35 has been prepared in the SDF SPD.

3.46. Therefore, highly prescriptive policy, that has the potential to contradict other planning policy, can become a hindrance that impacts negatively on design as opposed to assists – **thus as worded the policy is ineffective and unjustified.** Both the LPSS Policy D1 and the SDF SPD will need to be considered for planning applications on the strategic sites. On this basis, TW question the need for another policy addressing the same issues and as such they do not feel this policy should be applicable to strategic sites. TW question GBC’s justification for this repetition and feel it is inconsistent with paragraph 16e) of the NPPF which seeks to avoid unnecessary duplication.

3.47. TW supports the removal to the reference of piecemeal development in the Regulation 19 version. Policy D1 and the SDF SPD in the LPSS will ensure that the allocations, as a whole, are delivered in accordance with agreed parameters.

3.48. However, TW request that the following amendment is made to the policy in order to ensure the policy can be considered positively prepared, in line with the NPPF. TW seek the following amendments (red text indicates additional wording):

“6) Development proposals are expected to make efficient use of land and increased densities may be appropriate, particularly on strategic sites, if it would not have a detrimental impact on an area’s prevailing character and setting.”

3.49. In summary, TW believe developments should be assessed against LPSS 2019 and guidance in the National Planning Policy Framework, National Design Guide and Planning Practice Guidance, and thus this

	policy is not necessary. In addition as set out above, strategic sites such as the FWA will be assessed against the approved Strategic Design Codes. Should GBC decide to retain this policy, TW request that the amendments above are considered.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/269
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D5: Protection of Amenity and Provision of Amenity Space: encourage a balance between private and public amenity spaces.</p> <p>Policy D5: Protection of Amenity and Provision of Amenity Space – Object</p> <p>3.50. Overall, TW are supportive of this policy. It should be noted however that at the FWA, TW are proposing</p>

relatively high densities in specific areas, including the central core of the site, which inevitably will mean there is less opportunity for private amenity space. However, this is balanced out overall by the vast amounts of accessible public amenity space which will be provided.

3.51. It is important that amenity space is addressed as a whole across sites, but other areas (such as public amenity space, other public spaces, density) and design are not compromised on the basis of private amenity space provision. **As worded, the policy could be clearer in respect of a holistic approach to sites, notably larger scale and strategic sites. It is therefore ineffective and unjustified.**

3.52. Moreover, TW also wish to comment on part 1a of this policy which implies built in bin and cycle storage is required. This would be particularly challenging in regard to bin storage, as storage requirements and bin sizes change regularly.

“1) Development proposals are required to demonstrate that:

a) bin storage, cycle parking and electric vehicle charging points, whilst being designed to meet practical needs, are integrated into the ~~built form~~ plot layout and do not detract from the overall design of the scheme or the surrounding area”.

3.53. Overall, this policy should be amended as per the suggestion above, in order to ensure that it is effective and justified (paragraph 35, NPPF).

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/270

Respondent ID

20855297

Respondent Name

Taylor Wimpey

Agent Name

Savills (Miss Lucie Beckett)

Section	Policy D8: Public Realm
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D8: Public Realm: alterations to the policy to include reference to Design Codes for strategic sites and to ensure there is enough flexibility that the public realm is appropriate for each individual site.</p> <p>Policy D8: Public Realm – Object</p> <p>3.54. TW largely support this policy, albeit suggest modifications are included, to ensure that the policy is not overly onerous for developers and to ensure the policy is consistent with the LPSS. As worded the policy is ineffective.</p> <p>3.55. The following amendments are proposed (red text should be added, and strikethrough deleted):</p> <p>“2g) all new streets are tree-lined <u>incorporate tree planting</u> unless there are clear, justifiable and compelling reasons why this would be inappropriate, and their long-term maintenance is secured;”</p> <p>3.56. In addition, the following text should be added to part 3:</p> <p>“3)... d) <u>For strategic sites, public art strategies should be designed and approved in accordance with the Strategic Design Code submitted for each strategic site.</u>”</p> <p>3.57. These amendments are considered to improve the policy and ensure that it is consistent with adopted planning policy and the NPPF, and achieves the objective for quality public realm without being overly restrictive. In addition, it would be inappropriate in some locations to enforce that they are tree lined, however it is appreciated tree planting needs to be incorporated where possible. TW also suggests the policy cross refer to LPSS, as the Design Codes submitted with major strategic developments will include measures to ensure a</p>

	quality public realm.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/271
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D9: Residential Infill Development: add clarity to the policy to ensure that it is clear which sites the policy is directed at, i.e. not strategic sites.</p> <p>Policy D9: Residential Infill Development Proposals –Object</p> <p>3.58. TW raise questions over some of the working in this policy as it is not clear and is open for interpretation. Amendments are proposed below to ensure that the policy is positively prepared and effective.</p>

3.59. As per the definition in paragraph 5.91 infill development “includes any new residential development of a vacant site or the redevelopment of a developed site. It includes residential development within a garden. For the avoidance of doubt this does not carry the same definition as ‘limited infilling’ for Green Belt purposes.” Therefore this policy should be aimed at infill development only and not confuse this with development concerning larger-scale, allocated sites. This should be made clear in the policy so that there is no confusion.

3.60. TW understand the importance of comprehensive masterplanning and ensuring that sites, particularly where there are separate landownerships, do not prejudice the separate land parcels. Other policies such as those relating to design cover this issue.

3.61. TW suggest the following amends to the policy, indicated strikethrough:

“2) ~~Piecemeal development proposals will be resisted.~~ Where the Council considers that land has come forward which has been artificially subdivided, it will require appropriate infrastructure contributions commensurate with what would have been required on the larger site. Contributions will be based on a level of development across the comprehensive area which the Council considers appropriate.”

3.62. If GBC do not agree with the deletion of this sentence then TW believe the following should be amended to the supporting text definitions (additional text in red and deletion in strikethrough):

“5.94 Piecemeal development - in the context of this policy relates to small-scale uncoordinated development where individual applications are submitted for development across a ~~larger~~ developable area.”

3.63. Overall, TW believe these changes are essential as the policy is not clear as it stands and is open to interpretation which could hinder allocated site. The point on comprehensive masterplanning is covered by adopted Policy D1 and the SDF SPD. TW request that the policy is altered as per the suggestion above.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/272

Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D12: Sustainable and Low Impact Development: policy should be altered to refer to the Climate Change, Sustainable Design, Construction and Energy SPD.</p> <p>Policy D12: Sustainable and Low Impact Development – Object</p> <p>3.64. The policy is ineffective and inconsistent with national policy.</p> <p>3.65. TW object to this policy on the basis that it is not required and duplicates on matters that are covered by guidance specifically intended to cover this matter. This is not in line with national policy, as stated in paragraph 35 and 16e) of the NPPF.</p> <p>3.66. The policy should be altered to refer to the Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document (adopted 22 September 2020). It is essential that this SPD and the DMP document are aligned. However, the SPD should contain the detail on these areas and there is no need to repeat the same information in the DMP. The basis of this policy should have been tested in the LPSS. Due to the reasons listed above, this policy is unnecessary and should be deleted.</p> <p>3.67. It is also essential that GBC consider the viability of developments to ensure that the GBC housing trajectory is</p>

	<p>not compromised by making developments undeliverable.</p> <p>3.68. Given draft Policy D12 contains similar provisions as set out in the SPD, if GBC are minded to include this policy, TW do not have any specific comments on the wording other than in part 6 amending ‘possible’ to ‘appropriate’ as per the below (strikethrough wording should be removed and red text should be added):</p> <p><i>“6) New developments are expected to incorporate measures to harvest rainwater and conserve water resources and, where <u>appropriate</u> possible, water recycling/reuse systems.”</i></p> <p>3.69. TW believe this policy should be deleted, it is not necessary or consistent with National Planning Policy.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/273
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment

Policy D13: Climate Change Adaptation: policy should be altered to refer to the Climate Change, Sustainable Design, Construction and Energy SPD.

Policy D13: Climate Change Adaptation – Object

3.70. The policy **is ineffective and inconsistent with national policy.**

3.71. Similarly to the points raised in regard to policy D12, this policy does not require anything more or new compared to the Climate Change, Sustainable Design, Construction and Energy SPD. Planning applications should be considered against other relevant policies in the LPSS and to rely on guidance in adopted SPDs, the NPPF and Planning Practice Guidance.

3.72. If GBC are minded to retain the policy, the following minor amendments are suggested (strikethrough wording should be removed and red text should be added):

“1) Development proposals are required to demonstrate how new buildings will: ...

b) incorporate passive heat control measures, and the exclusion of conventional air conditioning, in line with the cooling hierarchy, where appropriate...

4) Development proposals are required to demonstrate adaptation for more frequent and severe rainfall events through measures including:

a) retaining existing and incorporating new water bodies;

b) designing planting and landscaping schemes to absorb and slow down surface water; and

c) the use of permeable ground surfaces wherever appropriate possible.”

3.73. Overall, TW object to this policy on the basis that it is not required and duplicates on matters that are covered by guidance specifically intended to cover this matter. This is not in line with national policy, as stated in paragraph 35 and 16e) of the NPPF.

What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/274
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D16: Designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D16: Designated Heritage Assets: seeks minor amendment to the Policy and that policies D17 to D20 are incorporated within this policy concisely.</p> <p>Policy D16: Designated Heritage Assets – Object</p> <p>3.75. Overall, TW are broadly supportive of the policy’s content, although it is largely repetitive of adopted National and Local policy and the wording could be shortened and simplified in order to make it easier to follow.</p> <p>3.76. Paragraph 5.262 of the GBC DMP incorrectly implies that setting is a heritage asset, which is contradictory to the Historic England guidance. This should be <u>deleted</u>.</p> <p>3.77. In summary, TW feel amendments should be made to this policy, TW suggest that Policy D17, D18 and</p>

	D19 are unnecessary, therefore they have suggested additions to Policy D16 below (in the instance GBC / appointed Inspector do not wish to fully delete these policies).
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/275
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D17: Listed Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D17: Listed Buildings: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.</p> <p>Policy D17: Listed Buildings – Object</p> <p>3.78. Given the content of Policy D16, this policy does not seem necessary. Instead reference to Listed Buildings could be added to Policy D16. This could include:</p>

	<p><u><i>“Development proposals are required to consider alterations, additions or other works, directly, indirectly or cumulatively affecting the special interest of a statutory listed or curtilage listed building and their settings”.</i></u></p> <p>3.79. The approach outlined in this policy is largely set out in a variety of guidance documents and policy. Listed Buildings are also covered by a well-established legal framework further reducing the need for a Local policy. Therefore, it does not seem necessary to repeat it again.</p> <p>3.80. In summary, TW do not consider it necessary to have a specific policy and that it is appropriate to rely upon National guidance in tandem with Policy D3 Historic Environment of the LPSS. This policy therefore conflicts with the requirements of paragraph 16e) of the NPPF. Key points can be incorporated into Policy D16. Alternatively, GBC could add TW’s suggested wording to Policy D16.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/276</p>
<p>Respondent ID</p>	<p>20855297</p>
<p>Respondent Name</p>	<p>Taylor Wimpey</p>
<p>Agent Name</p>	<p>Savills (Miss Lucie Beckett)</p>
<p>Section</p>	<p>Policy D18: Conservation Areas</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is Sound?</p>	
<p>Do you consider this section of the document complies with the Duty to cooperate?</p>	

<p>Comment</p>	<p>Policy D18: Conservation Areas: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.</p> <p>Policy D18: Conservation Areas – Object</p> <p>3.81. The policy is unjustified and inconsistent with national policy as it is repetitive.</p> <p>3.82. Given the content of Policy D16 this policy does not seem necessary. Reference to Conservation Areas could be added to Policy D16 so that this policy can be removed. The reference in Policy D16 could include:</p> <p><i>“New development within or which would affect the setting of a Conservation Area is required to preserve and enhance the character and local distinctiveness of the area. It must pay due regard to the Council’s Conservation Area Appraisal for the relevant area”.</i></p> <p>3.83. Overall, TW feel it is appropriate to rely upon National guidance in tandem with Policy D3 Historic Environment of the LPSS. This policy therefore conflicts with the requirements of paragraph 16e) of the NPPF. Key points can be incorporated into Policy D16. Alternatively, GBC could add TW’s suggested wording to Policy D16.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/277</p>
<p>Respondent ID</p>	<p>20855297</p>
<p>Respondent Name</p>	<p>Taylor Wimpey</p>
<p>Agent Name</p>	<p>Savills (Miss Lucie Beckett)</p>
<p>Section</p>	<p>Policy D19: Scheduled Monuments</p>
<p>Do you consider this section of the document is</p>	

Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D19: Scheduled Monuments: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.</p> <p>Policy D19: Scheduled Monuments – Object</p> <p>3.84. The policy is unjustified and inconsistent with national policy as it is repetitive.</p> <p>3.85. As highlighted above, this Policy does not seem necessary given the content of Policy D16. On this basis, reference could be added to Scheduled Monuments within Policy D16. This could be:</p> <p><u>“Proposals materially affecting a Scheduled Monument will be expected to pay consideration to preserving or enhancing the special historic interest and there will be a presumption against substantial harm to or loss”.</u></p> <p>3.86. TW believe it is not necessary to have a specific policy on this and it should be deleted, as this can be covered in Policy D16. There is nothing locally distinctive in the policy that is not already covered in national guidance and other legislation.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/278
Respondent ID	20855297
Respondent Name	Taylor Wimpey

Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D19a: Registered Parks and Gardens
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D19a: Registered Parks and Gardens: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.</p> <p>Policy D19a: Registered Parks and Gardens – Object</p> <p>3.87. The policy is unjustified and inconsistent with national policy as it is repetitive.</p> <p>3.88. As highlighted above, this Policy does not seem necessary given the content of Policy D16. On this basis, reference could be added to Registered Parks and Gardens within Policy D16. This could include:</p> <p><i><u>“Proposals materially affecting a registered historic park and garden will be expected to pay consideration to preserving or enhancing the special historic interest and there will be a presumption against substantial harm to or loss”.</u></i></p> <p>3.89. TW believe it is not necessary to have a specific policy on this and it should be deleted, as this can be covered in Policy D16. There is nothing locally distinctive in the policy that is not already covered in national guidance and other legislation.</p>
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/279
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy D20: Non-designated Heritage Assets
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D20: Non-designated Heritage Assets: question the need for the policy and suggest an additional line which could be added to Policy D16 to cover the thrust and aims of this policy.</p> <p>Policy D20: Non-designated Heritage Assets – Object</p> <p>3.90. The policy is unjustified and inconsistent with national policy.</p> <p>3.91. TW object to paragraph 5.388, which states that:</p> <p><i>“5.388 Annex 2 of the NPPF provides the following definition of a heritage asset – ‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)’. The definition makes it clear that heritage assets include those parts of the historic environment that may not be subject to a statutory designation (such as listing or scheduling).”</i></p> <p>3.92. The Planning Policy Guidance (July 2019) adds further detail stating that ‘Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of</p>

	<p>heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.’ It goes on to refer to local/neighbourhood plans, conservation area appraisals/reviews, and importantly, the local Historic Environment Record (HER) as examples of where these assets may be identified, but specifically notes that such identification should be made ‘based on sound evidence’, with this information ‘accessible to the public to provide greater clarity and certainly for developers and decision makers’. Thus, non-designated heritage assets are defined as those which have been specially defined as such through an appropriate source made accessible to the public by the plan-making body.</p> <p>3.93. On this basis the following sentence should be deleted.</p> <p><i>“The definition makes it clear that heritage assets include those parts of the historic environment that may not be subject to a statutory designation (such as listing or scheduling).”</i></p> <p>3.94. TW believe this policy supporting text should be altered on the basis it is inconsistent with National Policy and leaves the policy open to interpretation which could impact allocated sites.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/280</p>
<p>Respondent ID</p>	<p>20855297</p>
<p>Respondent Name</p>	<p>Taylor Wimpey</p>
<p>Agent Name</p>	<p>Savills (Miss Lucie Beckett)</p>
<p>Section</p>	<p>Policy ID6: Open Space in New Developments</p>
<p>Do you consider this section of the document is Legally Compliant?</p>	
<p>Do you consider this section of the document is</p>	

Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy ID6: Open Space in New Developments: adequate weight should be given to relevant SPD's and Policy D1 in the Local Plan (2019) and request for further clarity to the policy.

Policy ID6: Open Space in New Developments – Object

3.95. TW object to this policy on the basis that the policy should give adequate weight to relevant SPDs and Policy D1 in the Local Plan (2019). As per Paragraph 35 of the NPPF (2019), the DMP must be consistent with National Policy. Thus, as worded the policy is **ineffective, unjustified and inconsistent with national policy**.

3.96. There is currently a discrepancy between the ID6 proposed standards and those used within Part 3 of the Strategic Development Framework (SDF) SPD. Part 1 outlines the following:

1)

Typology	Quantity Standards (ha/1000 people)	Access standard (maximum distance from the new homes)
Allotments	0.25	480 Metres or 10 minutes walk time
Amenity Green Space	1 (total)	720 metres or 15 minutes walk time
Natural Green Space	1 (total)	ANGSt Standard

Parks & Recreation Ground	1.35 public & private of which is a minimum of 0.8 is public	720 metres or 15 minutes walk time
Play Space (Children)	0.05	480 metres or 10 minutes walk time
Play Space (Youth)	0.03	720 metres or 15 minutes walk time

3.97. Whilst the proposed ID6 policy standards are set out within Table 5 of the SDF SPD (including the identification of the three tiers of Children’s Play) the open space calculations for each strategic site relate back to the Saved 2003 Local Plan Policy R2 Recreational Open Space Provision In Relation To Large New Residential Developments.

3.98. Draft policy ID6 requires further clarification of the detail and catchment distances between the differing types of Children’s Play (LAP, LEAP & NEAP) as set out FIT guidance ‘Beyond the Six Acre Standard’ and Table 5 of the SDF SPD. The outlined 480m catchment is considered appropriate for LEAP provision only.

3.99. On this basis, TW propose the following changes to part 3:

3) Where new open space is provided, it should meet the following quantity and access standards:

Typology	Quantity Standards (ha/1,000 people)	Access Standard (expected maximum distance from new homes)
Allotments	0.25	720 metres or 15 minutes walk time
Amenity Green Space	1 (total)	720 metres or 15 minutes walk time
Natural Green Space	1.35 public & private of which maximum 0.8 is public	720 metres or 15 minutes walk time (except playing pitches)
Play Space (Children)	0.05	480 metres or 10 minutes walk time - <u>only applicable to LEAPS - need alternative provision for LAPS and NEAPS to align with FIT standards and GBC alternative walking times in</u>

		<u>particular for strategic sites</u>
Play Space (Youth)	0.03	720 metres or 15 minutes walk time

3.100. Section 6 sets out the requirement for Community Growing Spaces – TW object to these spaces not being considered in combination with allotments. Community growing gardens provide a popular shared doorstep facility as opposed to expansive allotments space which can require travel and are high maintenance. On strategic sites, such as FWA, there will be a Community Trust to manage the community growing spaces, these would be preferable to many residents and it would also assist in ensuring that the areas do not run derelict. The community cohesion associated with community growing spaces is also something that should be encouraged by GBC. On this basis, TW proposed part 6 is reworded as follows:

New residential development proposals are expected to consider provision of community growing space in-addition tandem with allotment provision ~~to other types of open space.~~

3.101. In addition to this, the supporting text should be updated (6.36-6.38). In particular TW request that the following change is made (new text and deleted text outlined):

~~“6.36 New statutory allotments provided onsite to comply with the quantity standards in policy ID6 will be required to be of at least the minimum size for a statutory allotment (see definitions), unless there is evidence that adequate existing provision of allotments of this size are available in the local area to meet some or all of the demand arising from the proposal. Applicants should be aware that community growing space will not be considered as a substitute for provision of allotments on strategic sites or for financial contribution towards allotments on non-strategic sites. On strategic sites, where evidence demonstrates there is not the need / limited demand for formal allotment space, a review can be undertaken for initial phases of development to assess demand, which can inform the provision proposed within future phases. The OSSRA (Section 6.2) provides some general quality 201 recommendations for new allotments. As Allotments are distributed within a 15 minute walk and to encourage modal shift, they should only require limited space to drop-off/pick-up heavier materials.”~~

3.102. Sections 4 and reasoned justification 6.43-6.46 outline opportunities for the provision of outdoor sports space. The playing pitch strategy is not yet published, therefore the evidence base for these sections of the policy is unknown and therefore cannot be interrogated at this stage. TW consider it inappropriate for draft policy to be included in

regard to the strategy, therefore part 4) should be deleted and replaced (see below). The following should be deleted:

~~“4) The standard for parks and recreation grounds in Table ID6a includes an allowance for playing pitches. Where artificial grass pitches (AGP) are proposed in place of natural grass pitches, this is required to be justified by evidence of local need for this type of pitch.”~~

3.103. The OSSRA 5.1.3 refers to Parks and Recreation grounds, which now include publicly accessible outdoor sports space pitches (including rugby and football) and non-pitch sports (including tennis and bowls). There is no further definition or guidance on what constitutes a sport (whether pitch or non-pitch). The FIT guidance provides a similarly restricted list, citing the most well-known pitch and non-pitch sports, which collectively may lead to missed opportunities to include other growth sports. TW believe an overarching definition of what constitutes a sport would take away some of the ambiguity around this topic, which could also reference those sports recognised by Sport England and UKsport. TW supports the wording used by The Council of Europe charter on sport, which uses the following definition. This should replace part 4):

"Sport means all forms of physical activity, which through casual or organised participation, aim at expressing or improving physical fitness and mental well-being, forming social relationships or obtaining results in competition at all levels".

3.104. There is no quantum or percentage given to the level of playing pitches that can be considered within the Parks and Recreation typology. It is not clear if this will be in addition to any sports standards coming forward or in tandem. On strategic sites, this could have significant effects on land budget and place making.

3.105. Whilst TW agree with the consideration of artificial grass pitches (AGP's) and artificial turf pitches (ATP's) as a potential for discounting sports provision on a case by case basis, however the policy and justification does not set out the mechanisms or equations on which these decisions will be made.

3.106. TW object to the lack of flexibility and quantification set out within section 4 and its justification. This wording is not supported by NPPF paragraph 35 (a) as it is not positively prepared. AGP are very beneficial for a number of reasons but notably allowing all year round use and multiple pitch and non-pitch sports to take place in the same area. These are appropriate for large strategic sites, and this has been strongly supported by the case officer for FWA. In the case of FWA, there will be a Community Trust which will ensure the management and maintenance of these pitches is

maintained in perpetuity and available for public use, thus the liability would not fall to Sports England. This unnecessary justification posed by the policy will discourage developers including AGP, even though they have potential to be highly beneficial. TW want this to be removed from the policy so that the necessary justification for the masterplan can be included within the planning application in the usual way. On this basis, TW propose part 4 of this policy is deleted.

3.107. Overall, TW object to this policy as it requires a number of changes in order to make it sound. At the moment it does not meet the tests of paragraph 35 in the NPPF as it is not justified or positively prepared. TW's changes suggested above need to be made in order for the policy to be acceptable.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/281

Respondent ID

20855297

Respondent Name

Taylor Wimpey

Agent Name

Savills (Miss Lucie Beckett)

Section

Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

Do you consider this section of the document is Legally Compliant?

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment	<p>Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network: some of the suggested routes are not within the public highway and take a different alignment to the routes agreed with Stakeholders TW have consulted.</p> <p>Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network – Object</p> <p>3.108. The map supporting the policy is unjustified and ineffective based on the present evidence base.</p> <p>3.109. The mapped routes which comprise the ‘Comprehensive Guildford Borough Cycle Network’ found in Appendix A broadly reflect the routes TW are developing in consultation with Surrey County Council with input from the GBC transport adviser. However, they do not reflect the TW-proposed routes upon which TW has consulted with stakeholders. In some cases the routes shown could not be delivered within the adopted highway. In some other cases the routes take a different alignment. The map and Policy should therefore be updated to reflect this, or be sufficiency adaptable to respond to ongoing discussions, and agreements with Surrey County Council supporting major development proposals. A fixed map is likely to be unjustified or ineffective.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/282
Respondent ID	20855297
Respondent Name	Taylor Wimpey
Agent Name	Savills (Miss Lucie Beckett)
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy ID11: Parking Standards: concern regarding the visitor parking requirements and the effects on sustainability and the overall masterplan.

Policy ID11: Parking Standards – Object

3.110. TW are broadly supportive of the majority of the content in this policy. **Though in one aspect the policy is ineffective.**

3.111. TW note that the parking standards now specify a maximum standard, whereas Surrey County Council (SCC) standards in their Vehicular and Cycle Parking Guidance (January 2018) specifies a minimum standard and SCC require consideration of addition parking “*where space permits*”. Whilst there is a difference here, TW do not object to the maximum standard proposed.

3.112. The parking standards for strategic sites includes the following text in part 2):

“b) the provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated”.

3.113. In progressing a series of detailed design matters, it is probable that a number of parking spaces will be allocated to specific dwellings. Over the scale of a strategic site, a literal application of 2c. would result in a significant provision of visitor parking, unlikely to be justified to meet needs and wider sustainability objectives. It is not yet certain how TW are proposing to allocate the residential parking but it is usual for a strategic sites to allocate well over 50% of the parking. In the case for FWA, this would mean, $2000 \times 0.2 = 400$ additional parking spaces to the stock on site. 400 spaces is a minimum of approximately 5,000sqm, plus access space and landscaping. Considering the increased push towards modal shift and encouragement of sustainability, this policy seems to be conflicting. It is concerning that there is such a binary trigger for the extra visitor parking on strategic sites, where their size will generate such a large number of extra spaces. This has potential to pose significant issues to a masterplan, increasing the dominance of cars, where the national objectives are quite the opposite. TW suggest part

	<p>2c) is <u>deleted</u>.</p> <p>3.114. It is considered that GBC need to review the wording within part 2c) of the policy in order to ensure that it is in line with national objectives and to ensure that it will not have detrimental effects on the masterplan, sustainability credentials and design of strategy sites.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/226
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Policy H8: First Homes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy H8: First Homes</p> <p>Whilst it is noted that this draft policy reflects current Government guidance, the sector is still getting to grips with what First Homes actually means and how it will be implemented, whether this will be by Registered Providers or</p>

	<p>Local Authorities. The combined impact of this draft policy and adopted Policy H2 is that the shared ownership product will be lost, which will have a significant impact on Register Providers, who would normally wish to see some shared ownership retained as it provides a more flexible sale product, as the initial equity shares can be purchased at between 10-40%. First Homes cannot offer this.</p> <p>The minimum discount for First Homes is 30% and there is concern that this could be increased which would have a real impact on the deliverability and viability of a scheme, which in turn would reduce the overall quantum of affordable homes that are delivered within the Borough. Through our close working with many Registered Providers we know there currently remains limited appetite to acquire the First Homes product and therefore heavy reliance on this product should be carefully considered within the planning policy and the policy worded to be an either/or with shared ownership to allow flexibility and avoid drawn out negotiations.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/227
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>Policy P6/P7: Biodiversity in New Developments</p> <p>Part 6 – Whilst the retention of tree canopies is supported, this part of the policy could be unduly restrictive and should allow losses where these are supported by arboricultural advice.</p> <p>Part 12 - A consistent approach to delivering Biodiversity Net Gain (BNG) is required across the country and this view is supported by Government. The most recent Government consultation on Biodiversity Net Gain Regulations and Implementation provides a very clear steer on this by reiterating the expectation that “Mandating biodiversity net gain through the Environment Act will establish a consistent set of requirements and necessary exemptions which give developers clarity as to how they can meet their net gain obligations.” By setting out a minimum requirement, the Government recognises the importance to all parties of consistency in such matters and this Policy which requires a 20% net gain in biodiversity is clearly not consistent with this position. Therefore, we consider the draft policy should be amended so that it requires a minimum of 10% BNG, but encourages developers to exceed this target wherever possible.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/228
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy P8/P9 – Protecting Important Habitat and Species</p> <p>We are concerned by the new definitions being introduced in respect of Irreplaceable Habitats which do not appear consistent with the NPPF. The Surrey Nature Partnership “Irreplaceable Habitats Guidance for Surrey” dated 2020 was formulated on draft Natural England guidance dated 2015, which we believe has now been superseded. We suggest reference to this should be deleted.</p> <p>The Local Nature Recovery Strategy is referenced, but is yet to be prepared. The development of this should follow the guidance from the Government’s pilot project in being collaborative and in consultation with all stakeholders.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/229
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	Policy D12 – Sustainable and Low Impact Development Part 2 (b) requires development proposals to demonstrate that embodied carbon emissions have been minimised through sourcing materials locally and taking account of the embodied carbon emissions of materials. There is no further detail regarding the targets which are to be achieved or how this will be implemented through the planning process. Therefore, this part of the policy is meaningless unless further clarity is provided on what is required.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/230
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy D14 - Carbon Emissions from Buildings Thakeham’s opinion is that the Council should prioritise a policy that sets a minimum proportion of carbon reduction

	<p>by improvements to a building’s fabric, as this lasts the lifetime of building, opposed to the lifespan of on-site renewable technology. Thakeham does however recognise that improvements to building fabric can only go so far.</p> <p>Based on our experience, the Council should target a 31% improvement on Part L in order to future proof the policy and make it in line with emerging ‘Future Homes Standard’ which is the next step in Part L of Building Regulations. Thakeham is of the opinion that it will be feasible for developers to meet this solely through Fabric First improvements, therefore the minimum proportion of carbon reduction by improvements to a building’s fabric should be 31%.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/231
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Policy ID5: Protecting Open Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy ID5 – Protecting Open Space

	<p>This Policy seeks to afford greater protection for Open Spaces and sets out that exceedance of the minimum standards within the Open Space Sports and Recreation Assessment (OSSRA) does result in a surplus, this seems somewhat contradictory given that the OSSRA was carried out to assess existing Open Space and future requirements.</p> <p>The Adopted Local Plan: Strategy and Sites designated Open Spaces based (in part) on the GBC Assessment of sites for Amenity Value 2017. Some of these Open Spaces were designated solely on their aesthetic value and it does not simply follow that they are then suitable to be repurposed to other open space typologies, as this could have other significant impacts. Instead, their suitability should be individually assessed.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/232
Respondent ID	38200961
Respondent Name	Thakeham Homes (Alison Walker)
Agent Name	
Section	Policy ID6: Open Space in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Policy ID6 – Open Space in New Developments

	<p>It would be very useful if there was further clarification within this policy and supporting text and tables;</p> <ul style="list-style-type: none"> • Table ID6a appears to suggest an overall total of 2.68 hectares of open space is to be provided per 1000 population, it would be useful if this total was clearly stated (as per Table 2 of the accompanying topic paper). • Table ID6a, the Access Standard for Natural Green Space references Natural England's ANGSt standard. It would be useful if this could be clarified particularly since Table 18 of GBC's OSSRA identifies that many parts of the Borough do not meet the ANGSt standard in respect higher tier (20ha, 100ha and 500ha) natural green space sites.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/59
Respondent ID	38135265
Respondent Name	Thames Water (David Wilson)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

<p>Comment</p>	<p><u>Policy H5: Housing Extensions and Alterations including Annexes</u></p> <p>As previously indicated, in relation to basement extensions, we support the requirement to have no adverse impact on local ground water conditions, flooding or drainage issues.</p> <p>Thames Water’s main concerns with regard to subterranean development are:</p> <p>1) The scale of urbanisation in certain areas can impact on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.</p> <p>2) By virtue of their low-lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.</p> <p>We also support supporting paragraph 2.13 in relation to sewer flooding and the installation of a suitable (positively) pumped device which is in line with our previous representations.</p>
<p>What changes do you suggest should be made to the document?</p>	
<p>Files</p>	
<p>Comment ID</p>	<p>LPDM21B/60</p>
<p>Respondent ID</p>	<p>38135265</p>
<p>Respondent Name</p>	<p>Thames Water (David Wilson)</p>
<p>Agent Name</p>	
<p>Section</p>	<p>Policy P6/P7: Biodiversity in New Developments</p>

Do you consider this section of the document is Legally Compliant?

Do you consider this section of the document is Sound?

Do you consider this section of the document complies with the Duty to cooperate?

Comment

Policy P6/P7 Biodiversity in New Developments

Thames Water are supportive of the principle of biodiversity net gain (BNG) will be complying with the requirements of the Environment Act 2021 for a minimum of 10% BNG as part of Guildford Sewage Treatment Works relocation development proposals.

Emerging Policy P6/P7 Biodiversity in New Developments, sets out a requirement for 20% BNG. Thames Water considers the policy to be unsound as there is insufficient evidence or justification for such a requirement that is twice that required by the Environment Act 2021 and thus not consistent with national policy and will not be effective in delivering development over the plan period.

No evidence or assessment is presented as part of the Regulation 19 Consultation that the cost of increasing BNG from 10% to 20% is justified in the local circumstances and that it is not prohibitive for development proposals in the Borough and, importantly for Thames Water, not prohibitive in respect of often constrained infrastructure development proposals that Thames Water brings forward. The available evidence published by Defra (Biodiversity net gain and local nature recovery strategies - Impact Assessment, Defra, 15/10/2019 - <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements> last visited 9/2/2022) concludes that 10% BGN is the right level when considering the trade-off between the cost implications for developers and the likelihood of net gain being delivered. Section 6.11.2 states: *'When analysing the impact of changing the level of net gain required, we show that doubling (to 20%)... the net gain percentage increases costs to developers by 19%...'*

Thames Water consider that Policy P6/P7 should be amended to be consistent with national policy, requiring 10% BNG, and be effective and justified.

What changes do you suggest should be made

to the document?	
Files	
Comment ID	LPDM21B/61
Respondent ID	38135265
Respondent Name	Thames Water (David Wilson)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy P13: Sustainable Surface Water Management</u></p> <p>With regard to surface water drainage, it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. We therefore support the supporting text at paragraph 4.182 in this respect.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water</p>

efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

We support the drainage hierarchy in Policy P13. However, we still request that the following be included in the Policy:

“Surface water drainage - The discharging of surface waters to the foul sewer can be a major contributor to sewer flooding and should therefore be avoided.”

In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

What changes do you suggest should be made to the document?

Files

Comment ID

LPDM21B/62

Respondent ID

38135265

Respondent Name	Thames Water (David Wilson)
Agent Name	
Section	Policy D12: Sustainable and Low Impact Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p><u>Policy D12: Sustainable and Low Impact Development – Water Efficiency</u></p> <p>We support Policy D12 in relation to water efficiency, but as previously indicated, we consider that further text is required in relation to the use of planning conditions.</p> <p>The Environment Agency has designated the Thames Water region to be “<i>seriously water stressed</i>” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text: “Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential</p>

	<p>development to ensure that the water efficiency standards are met.”</p> <p>We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/97
Respondent ID	15066945
Respondent Name	Theatres Trust (Tom Clarke MRTPI)
Agent Name	
Section	Policy D10: Noise Impacts
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	The Trust is supportive of this policy, which has been strengthened in line with our recommendations at the previous stage of consultation.
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/21
Respondent ID	38097441
Respondent Name	The National Trust (Mr Paul White)
Agent Name	
Section	Policy D11: The Corridor of The River Wey & Godalming Navigations
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	The National Trust is fully supportive of the provisions and wording of Policy D11 and welcomes the reference in paragraph 5.183 to the Trust's planning guidance for development next to the Wey and Godalming Navigations.
What changes do you suggest should be made to the document?	None
Files	
Comment ID	LPDM21B/22
Respondent ID	38097441
Respondent Name	The National Trust (Mr Paul White)
Agent Name	
Section	Policy D17: Listed Buildings

Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	The National Trust is supportive of Policy D17 and of the additional details provided in the Regulation 19 version of the plan. The Trust supports the amendments to this policy aimed at striking a better balance between climate change mitigation and energy efficiency improvements in relation to heritage assets. The Trust considers that flexibility will always be needed on a case by case basis but it is important that climate change mitigation should not override considerations of harm to heritage significance, where there may be other ways of delivering less intrusive efficiencies and improvements. The Trust also suggests that the benefits of mitigating the effects of climate change should be part of the broader package of public benefits of a proposed development and should also be proportionate to overcome the harm caused.
What changes do you suggest should be made to the document?	None
Files	
Comment ID	LPDM21B/23
Respondent ID	38097441
Respondent Name	The National Trust (Mr Paul White)
Agent Name	
Section	Policy D19a: Registered Parks and Gardens
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is	Yes

Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	Yes
Comment	The National Trust is supportive of the additions to Policy D19a that aim to protect key views in relation to Registered Parks and Gardens, including preventing unsympathetic sub-division of the landscape. The Trust notes that the requirement in the policy for development proposals to be accompanied by comprehensive information on the implications for the fabric or setting of a Registered Park and Garden has been removed in this version. The Trust requests that further explanation should be given in the Reasoned Justification as to what alternative measures or tests are in place to ensure that such analysis has been undertaken when development proposals come forward.
What changes do you suggest should be made to the document?	The National Trust suggests that the wording of 1a should be revised by replacing 'cause no unacceptable harm to the asset's significance' with 'not cause substantial harm to the asset's significance'. This change of wording would align Policy D19a with the wording in the guidance given in the National Planning Policy Framework paragraph 200 which uses the term 'substantial harm'.
Files	
Comment ID	LPDM21B/24
Respondent ID	38097441
Respondent Name	The National Trust (Mr Paul White)
Agent Name	
Section	Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Do you consider this section of the document is Legally Compliant?	Yes
Do you consider this section of the document is Sound?	Yes
Do you consider this section of the document complies with the Duty to cooperate?	Yes

Comment	<p>The National Trust is generally supportive of Policy ID10. The Trust notes the plans for a Sustainable Movement Corridor and wishes to highlight the potential benefits of extending this south from Gosden Hill Farm and so joining Clandon Park up with Guildford town centre via sustainable means of transport.</p> <p>The Trust reiterates its comment on the previous draft of Policy ID10 that it should reflect the requirement for a full assessment of the impact of required infrastructure associated with the proposed routes before those routes are finalised and agreed, in particular where the new infrastructure crosses sensitive landscapes of ecological or historic significance.</p>
What changes do you suggest should be made to the document?	The Trust suggests that text should be added to the Reasoned Justification to cover the need for appropriate impact assessment before potential cycle routes are promoted.
Files	
Comment ID	LPDM21B/4
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	Whilst we strongly support the principle of biodiversity gain through development, it should be recognised that

	constraints related to the specific nature of the proposals may inhibit on-site improvements. In such scenarios, offsite improvements should be considered, as suggested at part 16 of this condition.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/5
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	The policy stance is supported, but recognition of existing developed sites within or adjacent ancient woodland should be included. In such cases, a buffer may not be practical if development is already within this zone.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/6
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy P11: Air Quality and Air Quality Management Areas
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	The need to improve air quality is strongly supported, but there should be recognition of schemes which have the ability to improve air quality overall across a wider area through supply chain and process improvements, rather than specifically on site. In such cases, whilst on site emissions may be increased, if the overall reduction across the region can be achieved, then such developments should be supported.
What changes do you suggest should be made to the document?	
Files	

Comment ID	LPDM21B/7
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	This policy is supported, with the addition of the following wording (underlined) at the end of point 4: ‘Drainage schemes are expected to avoid the use of boreholes or other deep structures for the discharge of surface water to ground, except for clean roof water <u>or where consent specifically allows</u> ’.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/8
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	The requirement for high quality design and local distinctiveness is strongly supported, but it should be included that the level of design should be commensurate to the nature of the development proposed, particularly where the proposals relate to a functional development.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/9
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	It is agreed that privacy and amenity should be protected and this can be secured through the imposition of appropriately worded conditions, attached to planning consents, setting, for example, noise limits and hours of operation. Such limits should however be reasonable and not to the detriment of the operation of the development, particular where it is located on an existing developed site.
What changes do you suggest should be made to the document?	

Files	
Comment ID	LPDM21B/10
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy D10: Noise Impacts
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	The requirement for new development to identify and mitigate against potential existing sources of noise is strongly supported and accords with the Agent of Change principles.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/11
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy D10a: Light Impacts and Dark Skies

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	In general the policy is supported, however it is considered that part 6 should recognise that if lighting is required as an essential part of the ongoing operation of a site, a proactive view should be taken on the extent to which it could be deemed to cause light pollution.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/12
Respondent ID	37534593
Respondent Name	Union4 Planning (Carol Bowditch)
Agent Name	
Section	Policy D19: Scheduled Monuments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	The policy is supported, but it should be recognised that a number of ongoing operations are active within the vicinity of such heritage assets and it should be ensured that any adopted policy is not to the detriment of the efficient running of existing sites.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/19
Respondent ID	8609217
Respondent Name	West Clandon Parish Council (Sir or madam)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>Policy D9 Residential Infill Development</p> <p>The wording of the new policy and supporting text includes:</p>

Definitions 5.91 Infill development - this includes any new residential development of a vacant site or the redevelopment of a developed site. It includes residential development within a garden. For the avoidance of doubt this does not carry the same definition as 'limited infilling' for Green Belt purposes.

5.92 Frontage development – this normally comprises development of a gap in an otherwise continuous built-up frontage, or the redevelopment of existing properties within such a frontage

5.102 Infilling in villages LPSS 2019 Policy P2: Green Belt, alongside the NPPF, provides the basis for determining whether proposals for limited infilling in villages that are washed over by the Green Belt could be considered appropriate development under NPPF paragraph 149e or not. It is important to be clear that, should a development proposal be considered to be appropriate development in terms of Green Belt policy, this does not translate directly into the proposal being acceptable in terms of this design policy. These are separate tests and such proposals would need to demonstrate that they are both appropriate development in Green Belt terms, as well as being acceptable in design terms.

LPSS P2 4.3.26 (referred to in 5.102 above) For the purposes of this policy, limited infilling is considered to be the development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development. It should be appropriate to the scale of the locality and not have an adverse impact on the character of the countryside or the local environment.

In West Clandon, recent planning decisions have allowed:

- 1) the demolition of existing dwellings and their replacement with two dwellings with, in total, a much larger footprint than the original
- 2) the splitting of gardens to create new plots and subsequent grants of planning permission
- 3) development along a private driveway justified as infilling, initially for new plots for two dwellings each of which was then split and received planning permission for a further dwelling-4 dwellings in all. This is effectively backland development.

	<p>Thus, it appears that both infilling and intensification are happening in a village washed over by the green belt.</p> <p>The Parish Council does not consider the wording of the DMP to provide any clarification, rules or guidance on what would be permitted under “limited infilling” in a village washed over by the green belt. To simply say that the matter is covered by the NPPF begs the question because this document provides very little in the way of guidance and decisions by GBC appear to be out of line with LPSS P2. P2 refers to a forthcoming DMP for the green belt which seems to have been shelved.</p>
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/25
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy H5: Housing Extensions and Alterations including Annexes
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	West Horsley Parish Council accept that this policy is well supported by the Residential Alterations & Extensions SPD, 2018. However, we remain concerned that this is not always adhered to by those considering applications,

	<p>particularly in relation to separation and boundary distances between houses, and the positioning of dormer windows/ roof extensions to the rear of properties. It is accepted that the SPD is guidance, not policy, but without further policy protection for the planning issues that we face with regard to extensions and Alterations we believe the SPD needs to be given more weight, or the points brought into H5.</p> <p>Clear consideration must be given to the local character and landscape setting when deciding on extensions etc as there have been many that are completely out of proportion to the existing environment.</p> <p>The Green Belt SPD is long overdue - It was mentioned as being delivered as part of the Local Plan 2019. It needs to be given priority, as further guidance is needed for those wishing to extend or alter their homes with a view to staying in the Village, offering sensible enlargements to their family homes, yet they are continually refused.</p> <p>Recent applications have caused issue in relation to the addition of a study or home office, where it actually meets the space standards for a bedroom, so this is actually manipulating the housing mix policies in our neighbourhood Plan and also GBC's Local Plan as well as the SHMA. Whilst this policy is for existing homes, once a new house is built we are experiencing a high number of 'non-material amendments' whereby the internal layouts are being changed to accommodate a fourth or even a fifth bedroom. This needs addressing through this policy.</p>
What changes do you suggest should be made to the document?	<p>The policy could contain stronger reference to the need to preserve/maintain boundary clearances as this is the most frequent issue in this context that we deal with as a Parish Council.</p> <p>The issue of manipulating housing mix policies through the addition of supposed studies and home offices needs consideration whereby non-material amends are submitted as houses are being built.</p>
Files	
Comment ID	LPDM21B/36
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy E11: Animal-related Development

Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	West Horsley Parish Council welcome and fully support the changes to this policy to ensure that it is not just restricted to Equine Development. A visit to West Horsley will clearly demonstrate the proliferation of dog walking sites that have 'sprung up' within the last 5 years across our Green Belt and green field areas. Along with this comes fencing, hardcore for parking, floodlights, sheds and cabins, portaloos and all manner of equipment associated with doggy day care and training, as well as increased levels of noise from dog barking. It is becoming a blight across our landscape setting and hopefully the change to this policy will go some way to restricting this in the future.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/37
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy P6/P7: Biodiversity in New Developments
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	

Do you consider this section of the document complies with the Duty to cooperate?	
Comment	West Horsley Parish Council fully support this policy and welcome the strengthening of wording as we commented on in Reg 18. The referral to the prevention, and action to be taken, following intentional pre-application site clearance is fully supported as we have experienced this in the village with devastating effects on bio-diversity in terms of loss of habitat and tree cover.
What changes do you suggest should be made to the document?	
Files	
Comment ID	LPDM21B/38
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy P8/P9: Protecting Important Habitats and Species
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	West Horsley Parish Council support the changes to this policy, particularly with reference to the increased emphasis placed on the importance of hedgerows.

	<p>However, we remain concerned with regard to the protection buffer of 15m for Ancient Woodland. There is an allocated site development going through reserved matters at the moment. This site borders one of our Ancient Woodlands on the West Horsley Place Estate and we believe that the buffer zone should be substantially increased to afford better protection for this rare habitat.</p>
What changes do you suggest should be made to the document?	Increase the buffer zone protection for Ancient Woodland where is borders new development.
Files	
Comment ID	LPDM21B/48
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy P13: Sustainable Surface Water Management
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>West Horsley Parish Council have considered this policy very carefully, admitting that we are not drainage experts. However, we have three GBC Local Plan allocated sites in West Horsley, two approved and the third a part site approval, awaiting the rest to come forward. We therefore consider the flooding, surface water and sewage management measures submitted by developers in depth. There is always a preference for Attenuation Ponds, yet these are at the bottom of the SuDS hierarchy, with no pollution control or environmental benefits provided. We</p>

	believe that this policy could be strengthened by insisting on more sustainable methods of mitigation. For example, at Site A37 in West Horsley, not one green roof has been included, although at least each home is to have a water butt!
What changes do you suggest should be made to the document?	Strengthen the policy to ensure more sustainable mitigation methods are used to prevent surface water flooding.
Files	
Comment ID	LPDM21B/49
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	West Horsley Parish Council are concerned that the Residential Design Guide, 2004, is out of date and needs reviewed in the light of National Design Guidance, the encouragement for LA's to have local design codes and character studies. We are lucky in that we have an adopted Neighbourhood Plan with a Character Study, but we have been waiting three years for our Conservation Area Character Appraisal to be formally adopted by GBC, so this aspect can not be relied upon to ensure developers adhere to the character of an area.
What changes do you suggest should be made to the document?	Not specifically within the document, but there are a suite of guidance documents clearly needed to support this policy, and commitment needs to be given to having these produced.

Files	
Comment ID	LPDM21B/52
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy D5: Protection of Amenity and Provision of Amenity Space
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>West Horsley Parish Council welcome the addition of a Light and Dark Skies policy which will go some way to providing protection from the effects of extensive glazing and the addition of roof lanterns to protect the amenity of residents.</p> <p>We would welcome stronger emphasis on the use of appropriate boundary treatments. The new developments all put forward close boarded fencing, which is NOT in keeping with the local character - which is rural and open, with the majority of properties surrounding by natural hedging. Close boarded fencing is not environmentally friendly and is restricting the movement of wildlife, impacting our established wild life corridors.</p>
What changes do you suggest should be made to the document?	The policy needs to state that boundary treatments must be sustainable and give consideration to predominant types of boundary treatments within the local landscape setting.
Files	
Comment ID	LPDM21B/53

Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy D9: Residential Infill Development
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>West Horsley Parish Council welcome the response to our original comment on Reg 18, to include the reference to Neighbourhood Plans.</p> <p>We remain concerned about this policy as it does not appear to us that it will mitigate the impact of the increasing number of infill and windfall developments that we are practically experiencing in the village.</p> <p>The original policy title was Residential Intensification which to us, much better represents the need to have a policy that acknowledges and mitigates, or prevents, the impact of this on villages, whether still in, or out, of the Green Belt. It needs to cover infilling, windfall, and speculative back garden development, as well as the demolition of existing and replacement of new, or sometimes 2/3 new homes on the original plot. To us this is an intensification of land use and needs policy to control this.</p>
What changes do you suggest should be made to the document?	<p>The title should be changed back to Residential Intensification which we believe better reflects the issues that we are facing with this uncontrolled type of development, now that we are out of the Green Belt. If not, it must be made clear that this policy does cover all types on intensification of land use for residential development.</p> <p>Policy Point 3 needs to include a reference to respecting the existing street scene, especially as this is about frontage development.</p>

	<p>There should be specific mention of the need to respect visual separation between buildings, frontage widths, distances from the road and existing boundary treatments.</p> <p>The policy should also include a point to ensure that inappropriate sub-division of curtilages to size below that prevailing in the area will be refused.</p>
Files	
Comment ID	LPDM21B/54
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy D13: Climate Change Adaptation
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	
Comment	<p>West Horsley Parish Council have noted the response to our comments for Reg 18. However, with particular reference to the element of flooding we are still extremely concerned that the LLFA continue to fail to recognise that surface water levels have significantly increased over the last 4/5 years in this village and the surrounding area. Flood maps are out of date and there is NO assessment of how surface water and sewage overflow will be managed from the cumulative impact of local developments/allocated sites in West and East Horsley. Indeed developers on two recent occasions have worked with the EA and LLFA to agree to new maps based on the developer's modelling have been accepted for two allocated sites in West/East Horsley. This cannot be allowed. Little acknowledgment has been taken of residents submissions of objection with respect to these sites, yet they have lived here for years and have witnessed</p>

	<p>the changes.</p> <p>The usual reliance on attenuation ponds must be challenged - this is the least sustainable option to prevent pollution and environmental damage.</p> <p>Developers should be encouraged to use green roofs for example, a far more sustainable option.</p>
What changes do you suggest should be made to the document?	<p>The policy needs to demonstrate that options higher up in the Suds Hierarchy will be considered more favourably.</p> <p>Green roofs, planting that absorbs and slows down surface water run off must be more strongly promoted.</p> <p>Are there also other options for cooling buildings that could be included within the justification?</p>
Files	
Comment ID	LPDM21B/55
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy D14: Carbon Emissions from Buildings
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

Comment	<p>West Horsley Parish Council welcome the increased requirement for a 31% reduction in carbon emissions, but believe that to 'future proof' new homes, this should be increased to 40%. The Climate Emergency is real, and developers must accept that they have a major part to play in this, given that construction contributes significantly to this.</p> <p>We remain concerned that allocated site approved developments are still being allowed where the total reliance is on the installation of gas boilers. This amounts to some 400 plus homes across West and East Horsley, all gas boilers.</p> <p>Developers should be required to install the necessary infrastructure at the start of building that would provide future residents with an element of choice that is more cost effective and sustainable.</p>
What changes do you suggest should be made to the document?	The policy needs provision that ensures developers are required to install the appropriate infrastructure to enable the most sustainable options for heating and cooling are deliverable for the lifetime of the development.
Files	
Comment ID	LPDM21B/57
Respondent ID	26020001
Respondent Name	West Horsley Parish Council (Mrs Catherine Young)
Agent Name	
Section	Policy ID11: Parking Standards
Do you consider this section of the document is Legally Compliant?	
Do you consider this section of the document is Sound?	
Do you consider this section of the document complies with the Duty to cooperate?	

<p>Comment</p>	<p>West Horsley Parish Council accept that good changes have been made to this policy and the evidence is accepted. However, in our village and others, it does not manage reality and the severe issue of pavement parking whereby cars are straddling pavements. This is exacerbated at the weekend when residents are at home, and visitors arrive.</p> <p>Pedestrians frequently have to step out into the road as they walk round the village. The Parish Council constantly receives complaints about cars and vans parked on verges - which are then badly damaged in poor weather conditions. We have had to spend a considerable sum of money placing bollards to try and restrict some of the worst types of parking.</p> <p>One of the new developments recently completed at Site A36 (10 new homes) on Saturday 13th February had a car in each parking space, the visitor spaces were full, and four additional cars were parked across the new pavements. The modal shift towards more sustainable transport is not happening.</p>
<p>What changes do you suggest should be made to the document?</p>	<p>Revise and increase the number of car parking spaces in rural areas/villages.</p>
<p>Files</p>	

Report run at 9 Jun 2022 14:04:34. Total records: 400