

Guildford Development Management Policies Examination

List of Matters and Questions

8 September 2022

Please read the Examination Guidance Note circulated with this document.

The Council are asked to respond in full to every question except Matter 7.

Other respondents (particularly those attending the hearings) may wish to address the questions by submitting a further statement but there is no requirement to do so as existing representations made at Regulation 19 stage will be fully considered. A separate statement should be submitted for each policy.

It is important to note that the DMP follows the adoption of the Guildford Borough Local Plan: Strategy and Sites (the LPSS) in April 2019. The LPSS sets the planning strategy for the Borough over the period to 2034 and this includes the spatial strategy and allocations for meeting the housing and other needs of the area.

The examination of the DMP is not an opportunity to revisit the matters which have been determined by the LPSS. As a non-strategic, subsidiary plan the role of the DMP is to provide a suite of detailed development management policies to support the implementation of the LPSS. It follows that the DMP must be consistent with the LPSS, albeit providing more detailed or additional policy where necessary.

It is appreciated some representors have specific land or development interests in the Borough. However, the examination will not consider the application of the DMP or individual policies to specific sites or schemes, nor arguments which are advanced for site specific reasons. The merits of the policies will be considered on a generic basis only.

It is also important to note in respect of Policy ID11: Parking Standards that the examination will not consider the draft Parking SPD, only the content of the DMP. The Parking SPD is a matter for the Council.

Duty to co-operate and other legal requirements

No significant concerns have been raised by representors or identified by the Inspector to justify discussion at the hearings.

Matter 1: Policy H7: Review Mechanisms

Main Question: Whether Policy H7: Review Mechanisms is positively prepared, justified, effective and consistent with both national policy and the LPSS.

Supplementary Questions:

- 1.1 (For the Council) How often has reduced affordable housing provision been agreed? Please provide a list of recent cases. Have review clauses been agreed?
- 1.2 Is the scope of the policy sufficiently clear? Should small scale development (to be defined) be exempt?
- 1.3 Would 'late stage' reviews be effective? What would happen in the event of disagreement?
- 1.4 Should further details of the review process be included?

Matter 2: Policy H8: First Homes

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

Supplementary Questions:

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

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

Matter 3: Policy P6/P7: Biodiversity in New Developments

Main Question: Whether Policy P6/P7: Biodiversity in New Developments is positively prepared, justified, effective and consistent with both national policy and the LPSS.

Supplementary Questions:

3.1 Is the requirement for a 20% increase in biodiversity justified in the case of Guildford?

3.2 What would be the implications of a 20% increase on development viability? Would there be any unintended consequences?

3.3 If viability is an issue on a site, how does biodiversity feature amongst other priorities?

Matter 4: Policies D12-D15: Sustainable and Low Impact Development; Climate Change Adaptation; Carbon Emissions from Buildings & Renewable and Low Carbon Energy Generation and Storage

Main Question: Whether Policies D12-D15: Sustainable and Low Impact Development; Climate Change Adaptation; Carbon Emissions from Buildings & Renewable and Low Carbon Energy Generation and Storage are positively prepared, justified, effective and consistent with both national policy and the LPSS.

Supplementary Questions:

4.1 Is it justified for Policies D12 and D13 to revisit matters covered in LPSS Policy D2 and the Council's SPD?

3.2 Do these policies conflict with, or unnecessarily duplicate matters covered by national guidance or legislation?

Matter 5: Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

Question: Whether Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network is positively prepared, justified, effective and consistent with both national policy and the LPSS.

Supplementary Question:

5.1 Are the mapped routes adequately justified and would the network be effective?

Matter 6: Policy ID11: Parking Standards

Question: Whether Policy ID11: Parking Standards is positively prepared, justified, effective and consistent with both national policy and the LPSS.

Supplementary Questions:

6.1 In relation to non-strategic sites, is it justified for the policy to require compliance with the standards set out in a Parking SPD that does not form part of the plan?

6.2 In relation to strategic sites, is it effective for standards and guidance to be included in both the DMP and SPD? Is the difference in approach to non-strategic sites justified?

6.3 Is the requirement for 0.2 visitor spaces per dwelling where 50% or more spaces are allocated in Section 2c justified? Should there be more flexibility?

6.3 Are the maximum vehicle parking standards for strategic sites in Appendix B justified? Could there be any undesirable side effects? Are they maximum requirements when justification is needed to provide fewer spaces (Section 4a)?

6.4 Are the space and garage sizes in Section 5 justified?

Matter 7: Other Policies

Main Question: Whether the other policies in the DMP are positively prepared, justified, effective and consistent with both national policy and the LPSS.

(if responding to this matter, please submit a separate statement for each policy)

Matter 8: Viability

Question: Have the policy requirements in the DMP, including the requirements for First Homes, a 20% net gain in biodiversity and electric vehicle charging infrastructure, been adequately assessed in relation to viability to ensure that they do not undermine the deliverability of housing development in the area? If not, how can the matter be addressed and what would the implications be for the policies in the DMP?