Guildford Development Management Policies Examination

Response to Inspector's Matters, Issues and Questions submitted on behalf of Martin Grant Homes (ID: 8944737)

Matter 6: Policy ID11

October 2022



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INTRODUCTION

- 1.1 Barton Willmore, now Stantec is instructed by Martin Grant Homes (MGH) to submit this hearing statement in response to the Inspector's Matters, Issues and Questions. This statement expands upon the representations submitted on behalf of MGH at the earlier stages of the Local Plan: Development Management Policies' preparation.
- 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).
- 1.3 MGH and its consultant team continues to proactively engage with the Council and other consultees to develop MGH's emerging masterplan for the site.
- 1.4 This statement supplements the representation submitted at Regulation 19 consultation stage in February 2022 and responds to the outputs of ongoing discussions with the Council and the output of MGH's own technical work.

RESPONSE TO MATTER 6: POLICY ID11

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

1.1 The National Planning Policy Framework (NPPF) requires, at paragraph 107, that in setting local parking standards for residential and non-residential development, policies should take into account a number of factors, including the accessibility of the development, the type, mix and use of development, local car ownership and opportunities for sustainable transport. The approach taken by the Council is broadly consistent with national policy.

Supplementary Question 6.3: Is the requirement for 0.2 visitor spaces per dwelling where 50% or more spaces are allocated in Section 2c (for strategic sites) justified? Should there be more flexibility?

- 1.2 We broadly support the rationale for 0.2 visitor spaces per dwelling where 50% or more spaces are allocated. This is on the basis that different occupiers and tenure types will give rise to different requirements and that the use of unallocated spaces provides greater flexibility in terms of delivering alternative solutions to car parking design.
- 1.3 Car parking provision must be considered in the context of strategic sites which will be built out over several years, allowing for future changing trends in car ownership and opportunities to facilitate the repurposing of land which may become available if car ownership falls over time. Paragraph 6.122 of the supporting text recognises that a greater proportion of allocated spaces accommodates changes over time more effectively; further detail should be provided within this paragraph to set out that 'changes over time' could include potential reductions in car ownership and need for parking, which would facilitate the repurposing of parking spaces for alternative uses.

Supplementary Question 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)?

1.4 If applied directly and without any consideration for the promotion of sustainable travel within strategic sites, the maximum parking standards set out in Appendix B, have the potential to result in an over-provision of parking. However, the standards set out in Appendix B are linked to Policy ID11 Part 4(a) which allows for parking to be provided at

a lower rate than the defined maximum standards. It is not unreasonable for a justification to be provided, to show why maximum provision is not necessary.

1.5 Clarification should be provided within the standards to ensure that the maximum standards represent an average across dwellings of a given size on a site, on the basis that it is not possible to allocate a proportion of a space to a specific dwelling. For example, some 4+ bed dwellings may have 3 spaces on plot, while others may only have 2, with the overall average not being greater than the 2.5 maximum identified. If the Council do not intend for this to be the case, standards should be amended so that they do not include proportions of spaces.

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