
Examination Statement

Prepared by Savills on behalf of Taylor Wimpey UK Limited

Guildford Borough Council Development Management
Plan Examination in Public – **Matter 6 Policy ID11: Parking
Standards**

Regulation 19 Comment ID: LPDM21A/43

October 2022

1. Introduction

- 1.1. This Examination Statement in regard to the Guildford Borough Council Development Management Policies (GBC DMP) has been prepared by Savills on behalf of Taylor Wimpey UK Limited (TW), who own land at Former Wisley Airfield (FWA). TW is broadly supportive of the Draft GBC DMP, however feel some further refinements need to be made in order to ensure that the Plan is sound.
- 1.2. A Hybrid planning application has been submitted at FWA (ref: 22/P/01175), for a residential-led mixed use development of the strategic site, allocated by Policy A35 of the Guildford Borough Local Plan (“GBLP”) Strategy and Sites 2015-2034 (adopted 2019). TW, in collaboration with Hallam and CBRE, are proposing one settlement, which comprises three neighbourhoods. The full application description and application document are available on the council's website.
- 1.3. TW's representation to Guildford Borough Council (GBC) Regulation 19 DMP consultation (relevant to this matter) has been given the following reference Policy ID11: Parking Standards, comment ID: LPDM21A/43. **On this Matter, TW has not registered to appear at the Hearing. Rather, this Statement has been prepared to amplify the Regulation 19 representations made.**

2. Response to Inspector's Matters and Questions

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.

- 2.1. TW are broadly supportive of the majority of the contents of this this policy, although they object to part 2c of the policy and have comments on the broad thrust of the policy.
- 2.2. TW note that the parking standards now specify a maximum standard, whereas previously Surrey County Council (SCC) 2018 standards had minimum levels of provision. This has been updated in their 2022 guidance (reviewed 12 July 2022) to maximum levels of provision, so that aspect of the emerging DMP is now consistent with the approach of SCC. TW note that at paragraph 6.113 of the DMP, GBC refer to the 2021 guidance. SCC's 2022 guidance justifies lower parking provision in support of demand management and the most efficient use of land (part 1 of the notes, supporting the C3 Residential Parking Standards). SCC's guidance is however clear that for residential development additional visitor parking provision might be appropriate "*where appropriate, such as for flats, though not always necessary*" (part 4 of the notes). This is likely to lead to lower numbers of parking spaces than the emerging DMP (notably visitor), noting the GBLP requirements for sustainable modes of travel, bus/ cycle networks, as already included in policy, and in the case of the FWA, are actively being pursued through the planning application.
- 2.3. There is still a potential contradiction when emerging policy ID11 is read alongside, for example, the design policies of the GBLP (policies D1 and D2) which amongst other things require high quality design and in particular for the strategic sites requires a masterplanning process, tested through Design Review Panel. TW question if the entirety of policy ID11 is necessary given the policy and guidance already available, which prioritises good design and place making, which is not necessarily compatible with a more stringent approach to parking provision.
- 2.4. TW object to part 2c of the policy outlined in their response below to Inspector question 6.3 (1), TW feel this needs to be deleted, in order to ensure the policy is effective, justified and consistent with National

Policy. See response below.

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?

2.5. No comment.

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?

2.6. No, it is not justified or effective, in particular for strategic sites.

2.7. In relation to strategic sites, there are already a number of guidance and policy documents with requirements/guidance on parking – this includes, Surrey County Council (SCC) standards (2022), Neighbourhood Plans and the Strategic Development Framework SPD (July 2020) applicable to the strategic sites allocated in the GBLP. It is not necessary or justified for an additional policy document (the part 2 local plan – DMP) to outline additional, and potentially conflicting standards, without a clearer commitment to flexibility, notably for visitor parking and overall parking numbers, which might act to achieve a better design solution. The thrust of present adopted policy and guidance is for high quality design, and a masterplanning process, all of which has, for example, been undertaken at the FWA to inform the recently submitted planning application.

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?

2.8. No, it is not justified or effective.

2.9. The parking standards for strategic sites includes the following text in policy ID11 part 2):

“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”.

2.10. In the case for FWA, a number of parking spaces will be allocated to specific dwellings. Over the scale of a strategic site, a literal application of criterion 2c. would result in a significant provision of visitor parking,

unlikely to be justified to meet needs and wider sustainability objectives. In the case for FWA, this would mean, $1,730 \times 0.2 = 346$ additional parking spaces, plus access space and landscaping, to the stock on site.

- 2.11. Overall, considering the increased national push towards modal shift and encouragement of sustainability transport and high quality design, the emerging policy seems to be conflicting. This could have detrimental effects on an overall masterplan and the subsequent reserved matters, which will already be guided by design codes (a likely planning condition) on the basis of GBLP policies D1 and D2 and the guidance contained in the SDF SPD. TW suggest criterion 2c) is deleted. This will ensure that the plan is consistent with national objectives and will ensure the policy is justified and effective. In addition, it is not clear what the criterion 2c achieves, in light of the 2022 SCC parking guidance, and more flexible approach adopted for visitor parking.

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)?

- 2.12. Whilst specific comment on criterion 4 was not made in TW's Regulation 19 representations, it is apparent that as applied, the emerging policy ID11 effectively sets the parking standard to the maximum as a default as justification is required to propose lower parking provision than this maximum. Whilst, the FWA proposal includes a wide range of sustainable transport measures (all as part of the masterplanning process), TW questions whether criterion 4 is necessary, as justified and effective. A more effective, and flexible approach, is already provided by SCC's 2022 Parking Standards.

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

- 2.13. No comment.

[REDACTED]
Director
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