

Guildford Borough Local Plan: Development Management Policies Examination

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Dear Mr Harrison

DEVELOPMENT MANAGEMENT POLICIES EXAMINATION: POST HEARINGS LETTER AND MAIN MODIFICATIONS

Further to the recent examination hearings, can I first thank the Council for making the necessary practical arrangements so that the hearings could run smoothly, and also to Mr Williams, the various officers and consultants for explaining the plan and answering the numerous questions from myself and the other participants.

The two-week consultation period on the Council's BNG Capacity in Guildford Note (document ED GBC 010) has now passed and the responses have been carefully considered together with all the representations made at Regulation 19 stage, the Council's responses in Appendix 6 of the Regulation 22 Statement (GBC CD 019), the hearing statements from the Council and other participants in response to my list of matters and questions (ID02), and the points made by all parties at the hearing discussions themselves.

I am now able to provide a list of the main modifications (MMs) which are necessary to address soundness concerns and which should now be published for consultation purposes. A small number are required, and the need for these is as follows:

MM1 Policy H7: Review Mechanisms – to clarify the scope of the policy, the process involved and to ensure a dispute resolution mechanism is included.

MM2 Policy H8: First Homes – to explain the valuation process and to introduce limited flexibility when justified.

MM3 Policy P6/P7: Biodiversity in New Developments – to clarify the general principles, and in relation to biodiversity net gain (BNG), to clarify the requirements for previously developed land and the potential for flexibility should development viability be an issue. Having considered the extensive evidence before the examination, I am satisfied that local biodiversity decline justifies a minimum 20% BNG in the Borough, and that this level would both be achievable given the likely availability of opportunities to deliver this off-site locally if necessary and would not unduly impact on the viability of development in most cases. However, the MM needs to make clear that the minimum BNG policy will not be introduced prior to the national scheme to ensure any secondary legislation is in place and off-site options are more readily available to avoid any lack of clarity or unnecessary disruption to the delivery of development.

MM4 Policy D14: Carbon Emissions from Buildings – to align the requirements with the building regulations.

MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network – to clarify the status of the network in Appendix A and to provide more guidance as to potential solutions in rural areas, for example the designation of quiet lanes and traffic calming measures.

MM6 Amendment to Appendix A Figure A1 – add additional route along Long Reach, West Horsley whilst also retaining routes along Old Lane and Ockham Road North. A consequential change will need to be made to the Policies Map in due course.

MM7 Policy ID11: Parking Standards – to align the provision of electric vehicle charging with the building regulations, to clarify the status of the Council’s Parking Standards for New Development SPD in decision making, the purpose of maximum standards and the need for justification when the standards are not met.

A full explanation of the reasons for these MMs will be included in my final report.

In relation to the detailed wording of the MMs, in many cases the wording already put forward by the Council in response to soundness concerns will suffice whilst in other cases the wording will be drawn up or otherwise agreed by me. Please prepare a schedule for final approval by me for the purposes of further consultation, also a plan showing the draft change to Appendix A.

A copy of this letter should be put on the examination website for information. No responses are invited from other participants at this stage as this is the purpose of the forthcoming consultation period on the main modifications.

Yours sincerely

David Reed

INSPECTOR