

# LOCAL PLAN POLICIES

This paper is written with a view to responding to Policy S3. A coordinated approach has been taken between Guildford Vision Group, and the Guildford Society. It is worth noting three important matters in this context:

- 1) Inclusion of policy S3 is required but does not in our view make the plan sound. Our concerns remain that the council have not demonstrated exceptional circumstances that they have not taken a brownfield first approach as advocated in the plan.
- 2) any uplift in town centre delivery across the plan period requires a revised sustainability appraisal (all 8 options in the SA set the same level of delivery in the town centre) - this requires substantial re-consultation.
- 3) as part of that consultation it is important that the council pay proper regard to the full remit of the statutory duty to co-operate and other elements of the planning practice guidance which require the local community to be involved in such circumstances.
- 4) There are several amendments that are required to other Policies in the Plan, to ensure the plan policies remain coherent, due to the introduction of Policy S3, and its intent and purposes. We also propose S3 is supplemented with an additional policy S4 to support Guildford's urban areas.

Para 155 of framework in relation to local plans is as follows:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

Whilst our suggested wording of S3 and other policies may be agreed between those at our side of the table there are a multitude of other stakeholders in town centre that would need to agree the wording of the policy and we think this may even need to be undertaken alongside a call for sites in the town centre and urban area and new LAA.

Para 154 is also helpful to have regard to when drafting any suggested policies, and we recognise the need to comply with its provisions.

“Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.”

**What we have provided**

Rather than produce fully articulated policies we have in the tables below commented on specific paragraphs or additions desired and in some cases particularly for S2, S3 and S4 provided proposed text. We have provided numbering to aid navigation vs. the submitted plan and the proposed S3 provided by GBC.

Vision and Ambition – Section 3, Page 19:

We recommend that this be amended to set out the imperative to find more brownfield sites in the Town Centre and in the Guildford Urban Area.

This needs to include a very clear vision and aspiration for the town centre that is NOT as structured in p20 paragraph 4 where the focus is on retail and North Street. As drafted, we believe it is completely the wrong way around and therefore has the wrong emphasis.

Policies

Policy	Paragraph	Action and Comment	Proposed Text
S2		Planning for the borough - our spatial development strategy	
	4.1.5a	Modify 4.1.5 to be	<i>Our development strategy for the plan period is based on national planning policy which includes a brownfield first approach consistent with sustainable development objectives. Our spatial strategy recognises the environmental and transport constraints and plans positively to create opportunities for sustainable development consistent with the distinctive characteristics of the Borough.</i>
	4.1.5b	Add between 4.1.5 and 4.16	<p><i>Notable considerations for the spatial strategy are:</i></p> <ul style="list-style-type: none"> <li><i>• the consequences of Guildford being a gap town at a crossing point through the North Downs and of its setting in the Surrey Hills AONB with implications for the distribution and form of development due to the importance of views</i></li> <li><i>• the extent of constraints in the borough and the degree to which successful redevelopment of the town centre and economic land relies upon a proactive, coordinated approach to site assembly and to infrastructure provision, including transport and flood risk management, to unlock development</i></li> </ul>

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Policy	Paragraph	Action and Comment	Proposed Text
			<p><i>potential</i></p> <ul style="list-style-type: none"> <li>• <i>the need to ensure growth can be sustained in the long term providing options for future generations to prosper rather than exhausting all development options within a plan period noting that the Sustainability Appraisal cautions there are limits to the scope for development extending along the A3 corridor without unacceptable harm.</i></li> </ul>
	4.1.6	Replace as it should set out the spatial hierarchy as in the Sustainability Appraisal report	<p>The policy is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). Those locations, sequentially, are:</p> <p>Tier 1 - Guildford town centre</p> <p>Tier 2 - Guildford urban area</p> <p>Tier 3 - Ash and Tongham urban area</p> <p>Tier 4 - Built up area of villages</p> <p>Tier 5 - Village 'gap' sites</p> <p>Tier 6 - Brownfield in the Green Belt</p> <p>Tier 7 - Countryside beyond the Green Belt (CBGB)</p> <p>Tier 8 - Green Belt around Guildford</p>

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Policy	Paragraph	Action and Comment	Proposed Text
			<p>Tier 9 - New settlement</p> <p>The description of these needs to be in the text or spelt out in a revised and amended Settlement Profiles Report and Settlement Hierarchy Report</p>
	4.1.6A	<p>A new paragraph is required that spells out the approach taken (and to be taken) to identify suitable development opportunities in each area sequentially. This should include a statement along the lines of the response GBC gave to the Inspector’s pre-hearing questions (4.1.5):</p>	<p>“As part of the site selection process, the Council explored each spatial location and sought to maximise sustainable opportunities for growth within each up to the point at which it is considered that the harm of allocating more homes would significantly and demonstrably outweigh the benefits. At this point the Council explored the extent to which sites could be identified in the next spatial location and so on.”</p>
	4.1.6B	<p>New Para Given the release of Green Belt in this plan period – assuming the Inspector considers it is inevitable under the circumstances – it is important to continue to apply a brake on green belt development where it would have the effect of obstructing development of brownfield land in the top three tiers.</p>	<p>NPPF Paragraph 80 sets out five purposes for the Green Belt</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas</li> <li>2. to prevent neighbouring towns merging into one another</li> <li>3. to assist in safeguarding the countryside from encroachment</li> <li>4. to preserve the setting and special character of historic towns</li> <li>5. <u>assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</u></li> </ol> <p>We consider the fifth purpose to be vital in directing development to the extent possible to the top three tiers.</p>

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Policy	Paragraph	Action and Comment	Proposed Text
	4.1.6C	New Para	No release of Green Belt land should be contemplated until plans for potential Brownfield land in Tiers 1,2,3 have been documented and agreed. (It is expected that 3000-4000 dwellings and XXSQ/M Commercial space may be available)
	4.1.6D	New Para  There also need to be specific paragraphs to explain the remainder of the spatial strategy for other uses, and to promote a high-quality environment that observes a planning hierarchy that puts people before spaces before buildings, and that respects historic and heritage spaces, places, buildings, other assets, character areas, views and settings.	
S2		Amend the policy to point to specific policies for the town centre	
	Monitoring	The monitoring indicators should include an analysis of homes and other development per tier.	
Draft S3		<b>Guildford Town Centre</b>	
	4.1.12	No Change	The Council is committed to ensuring that where the policies and allocations within the Local Plan have been accounted for in the delivery figures in the land availability assessments,

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Policy	Paragraph	Action and Comment	Proposed Text
			they are deliverable and the Local Plan's objectives are realised over the plan period.
	4.1.13	Simplified	<p>The Council is enabling delivery of allocated developments through a range of proactive measures. These include:</p> <ul style="list-style-type: none"> <li>• Taking steps to enable infrastructure for development the Slyfield Area Regeneration Project / SARP (Policy A24); North Street (A6); Guildford Park Road and Bright Hill car parks (A11 and A12)</li> <li>• Playing a leading role, with other delivery partners, in catalytic infrastructure interventions that realise growth and regeneration opportunities (such as the Sustainable Movement Corridor, new railways stations at Guildford West (Park Barn) and Guildford East (Merrow) and the new road bridge and footbridge over the rail line near Ash Station;</li> </ul>
	4.1.14	Suggested Inclusion	The Evidence Base for the Local Plan (notably the Settlements Hierarchy Report and the Sustainability Appraisal) identifies the primary focus for development must be in Guildford Town Centre (Tier 1), the Guildford Urban Area (Tier 2), and Ash & Tongham Urban Area (Tier 3) sequentially in that order.
	4.1.15	Suggested Inclusion	The Council has worked on and consulted on various plans for Guildford Town Centre and is committed to bringing forward a master plan or master plans for the town centre that build on the work of the Council and the wider community and its

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Policy	Paragraph	Action and Comment	Proposed Text
			<p>community groups.</p> <p>In order to facilitate that process, the Council is setting an open mix of uses in the area covered by the Town Centre Regeneration Strategy, with a focus on environmental, traffic and transport improvements, the provision of other enabling and necessary infrastructure, delivery of well-designed communities of housing, employment and retail space.</p>
	4.1.16	<p>Suggested Inclusion</p> <p>Note the The Local Development Scheme should be amended to show the progression of this in the early plan period</p>	<p>The Council will bring forward a master plan for the town centre that it intends will have planning status (either as a Supplementary Planning Document, facilitated by the relaxation of strict allocations on specific sites, or, if necessary, as a Development Plan Document or Local Development Document).</p>
	4.1.17	<p>Suggested Inclusion</p> <p>Note the constraint that GBC that identify due to heritage can be mitigated as any new buildings or spaces reflect the setting of listed buildings and character of conservation areas then it is not a bad thing. There are plenty of examples, in Guildford, where the setting of the conservation areas (around the river) are significantly detracted by poor urban form, spaces and buildings and more than capable of enhancement.</p>	<p>The Council will facilitate the ambitious regeneration of the non-heritage areas of the town centre by advancing and collaborating on key regeneration opportunities as part of the Guildford Town Centre Regeneration Strategy and subsequent adopted master planning documents, including leveraging its own landholdings as part of efforts to promote mixed use and higher density development supporting the vitality and vibrancy of the town centre.</p>

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Policy	Paragraph	Action and Comment	Proposed Text
	4.1.18	Suggested Inclusion	The Council will work on strategies to regenerate areas of the Guildford Urban Area which, by their nature, may not be able to be brought forward during the Plan Period, but which should form part of the land availability assessments for subsequent Local Plans.
	4.1.21	Suggested Inclusion	<p>In undertaking and further to these actions, the Council will explore the use of a range of mechanisms at its disposal to support regeneration and the accelerated development of housing and mixed-use schemes.</p> <p>These include using, where appropriate, compulsory purchase powers, granting permission in principle, assisting in land assembly and playing a coordinating role with its development partners around development opportunities.</p> <p>GBC will set up a Developments Corporation or other delivery vehicle to facilitate the regeneration of the town centre.</p>
	4.1.22	Suggested Inclusion	The borough's town centre (and urban areas) will form the key focus for these measures to support and accelerate growth in these sustainable locations and maximise the use of previously developed land.
	4.1.23	Suggested Inclusion	This will occur with careful attention to the Local Plan's design policies, Development Management policies <sup>1</sup> , the provisions

<sup>1</sup> The Development Management DPD has not yet been published in its first draft for consultation and the NPPF 153 notes that: "153. Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified." It cannot be appropriate to have a policy and verbiage in the Local Plan that refers substantially to a future DPD that has not

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Policy	Paragraph	Action and Comment	Proposed Text
			of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development in the town centre and urban areas.
<b>S3</b>			<b>DRAFT POLICY S3: Delivery of development and regeneration within the Town Centre</b>
			Coordination of development in the Town Centre
	(1)	Suggested Inclusion	Non-allocated sites in the Guildford Town Centre are being washed over with a wider planning status that allows for a mix of uses, including residential uses (whilst restricting most retail to active frontages and the prime retail area).
	(2)	Suggested Inclusion	The Council expects multiple sites to be master-planned to optimise streetscapes, roofscapes, scale, bulk and massing, and to ensure that the public realm is of high quality and works effectively and beneficially with the heritage and riverside assets in the Town Centre.
	(3)	Suggested Inclusion  Note: To support this the council should prepare a separate Infrastructure Delivery Plan for the Town Centre where necessary infrastructure will be identified, costed, and	Enabling infrastructure will be supported in the Town Centre where it helps to relieve existing problems, enable development and improve the environment in the town centre by reducing or removing vehicles.

formed part of the Local Plan but that is signposted in the Plan.

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Policy	Paragraph	Action and Comment	Proposed Text
		delivery timescales set out.	
	(4)		<p>Development proposals will be encouraged to seek opportunities to enable the future development potential of adjacent sites. In this regard:</p> <ul style="list-style-type: none"> <li>(a) Submissions for planning permission will be required, where appropriate, to demonstrate consideration of surrounding properties and their development potential as part of reflecting on the wider design context of the scheme;</li> <li>(b) Where proposals undermine such development potential, they will be refused.</li> </ul>
	(5)	Suggested Inclusion	<p>The Council recognises that the Exceptional Circumstances required to release sites in the Green Belt [specify these?] and will bring forward a Town Centre SPD to demonstrate the amount of unmet need to be accommodated in the Green Belt, taking full account of its duty to co-operate with other authorities, agents, stakeholders and community groups.</p>
			<p>Coordination of development in the rest of the Guildford Urban Area</p>
	(6)		<p>Non-allocated sites in the Guildford Urban Area (excluding Guildford Town Centre), where the Government-published Indices of Multiple Deprivation show there are specific needs that can be met through positive planning, master planned</p>

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Policy	Paragraph	Action and Comment	Proposed Text
			development of sites exceeding 1Ha will be encouraged for a mix of uses to heights up to five stories, principally residential, where it can be shown that those uses will contribute to resolving the identified issues.
			More efficient use of land and the acceleration of housing delivery
	(8)		The inclusion of residential development as part of mixed-use schemes will generally be supported.
	(9)	Suggested Amendment	<p>Schemes that seek to make more efficient use of land for housing development, including as part of mixed-use schemes, will generally be supported. Active ground floor uses will be encouraged on busier streets.</p> <p>To ensure vibrancy in the town centre all opportunities will be taken to increase Dwell times in the centre by provision of leisure opportunities e.g. Art Galleries, Cinema etc.</p>
	(10)		In seeking to achieve more efficient use of land and/or accelerated housing delivery, the Council will where appropriate utilise mechanisms such as its compulsory purchase powers.
			Reasoned justification
	4.1.24		Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its “Place Making”

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			<p>theme. Key projects to support this and the delivery of the Local Plan include:</p> <ul style="list-style-type: none"> <li>(a) Facilitating the delivery of a major new mixed development in North Street</li> <li>(b) Implementing the vision of an updated Town Centre Regeneration Strategy</li> <li>(c) Improving the public realm, including surfaces, in key town centre areas</li> </ul>
	4.1.25		<p>Whilst the Council will play a key coordinating role aimed at achieving delivery of development and regeneration, the Council expects the private sector to be central to this process. It is important that schemes that seek planning permission are conceived and designed in a manner that considers regeneration opportunities beyond the boundaries of the site, to help deliver regeneration plan. Collaboration between adjacent and surrounding property owners in the Guildford town centre, including efforts that seek to maximise regeneration opportunities through mutually supportive design elements, uses and access arrangements are supported.</p>
	4.1.26	Suggested Inclusion	<p>Where the private sector does not or will not bring forward schemes that make the most of opportunities to regenerate both places and spaces, the Council will, where appropriate, use its statutory powers to bring about master-planned</p>

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Policy	Paragraph	Action and Comment	Proposed Text
			development.
	4.1.27	Amended	<p>The delivery of housing in the town centre adds to its vitality and vibrancy. The Council regards the town centre as critical in terms of meeting needs for main town centre uses. However, the creation of new housing opportunities in this location (and in urban areas more generally) is also regarded as desirable. Whilst the Local Plan has allocated sites for a wide variety of homes, as part of regeneration efforts more housing is likely to come forward over the plan period. It is important that this occurs in a manner that makes the most of its central location and is thus developed at a density that is appropriate, bearing in mind heritage, design and flooding considerations. Consistent with the masterplan.</p>
	4.1.28		<p>Furthermore, mixed use development, which may retain or re-provide retail, leisure and employment uses in the town centre, in line with Local Plan policies, holds the potential to increase the intensity of development on sites. Including housing as part of careful redevelopment presents an opportunity to enhance the vitality of the town centre and increase delivery of homes in sustainable locations.</p>
<b>S4</b>		<b>NEW POLICY - Guildford Urban Area</b>	
	4.1.12	Suggested Inclusion	<p>The Council is committed to ensuring that where the policies and allocations within the Local Plan have been accounted for in the delivery figures in the land availability assessments, they are deliverable and the Local Plan's objectives are</p>

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Policy	Paragraph	Action and Comment	Proposed Text
			realised over the plan period.
	4.1.13	Suggested Inclusion	<p>The Council is enabling delivery of allocated developments through a range of proactive measures. These include:</p> <ul style="list-style-type: none"> <li>• Slyfield Area Regeneration Project / SARP (Policy A24);</li> <li>• Working with the University to ensure previously agreed land released from the Green Belt is effectively used and that opportunities are taken to effectively use University Land e.g. Car Parking Space</li> </ul> <p>Playing a leading role, with other delivery partners, in catalytic infrastructure interventions that realise growth and regeneration opportunities (such as the Sustainable Movement Corridor, new railways stations at Guildford West (Park Barn) and Guildford East (Merrow) and the new road bridge and footbridge over the rail line near Ash Station;</p>
	4.1.14	Suggested Inclusion	<p>The Evidence Base for the Local Plan (notably the Settlements Hierarchy Report and the Sustainability Appraisal) identifies the primary focus for development must be in Guildford Town Centre (Tier 1), the Guildford Urban Area (Tier 2), and Ash &amp; Tongham Urban Area (Tier 3) sequentially in that order.</p>
	4.1.18	Suggested Inclusion	<p>The Council will work on strategies to regenerate areas of the Guildford Urban Area which, by their nature, may not be able to be brought forward during the Plan Period, but which should form part of the land availability assessments for</p>

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Policy	Paragraph	Action and Comment	Proposed Text
			subsequent Local Plans.
	4.1.19	Suggested Inclusion	The Council is setting a wider policy framework in the estates of North Guildford where sites in excess of 0.5 Hectares can be developed at a higher density with building heights up to five storeys (whilst respecting neighbouring properties), and where attention is paid to helping to relieve relative deprivation as illustrated by the current indices of multiple deprivation for the respective output areas.
	4.1.20	Suggested Inclusion	The Council is setting a wider policy framework in the Ash & Tongham Urban Area where sites in excess of 0.5 Hectares can be developed at a higher density with building heights up to four storeys (whilst respecting neighbouring properties), and where attention is paid to helping to relieve relative deprivation as illustrated by the current indices of multiple deprivation for the respective output areas.
	4.1.21	Suggested Inclusion	<p>In undertaking and further to these actions, the Council will explore the use of a range of mechanisms at its disposal to support regeneration and the accelerated development of housing and mixed-use schemes.</p> <p>These include using, where appropriate, compulsory purchase powers, granting permission in principle, assisting in land assembly and playing a coordinating role with its development partners around development opportunities.</p>

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Policy	Paragraph	Action and Comment	Proposed Text
	4.1.22	Suggested Inclusion	The borough's urban areas will form the key focus for these measures to support and accelerate growth in these sustainable locations and maximise the use of previously developed land.
	4.1.23	Suggested Inclusion	This will occur with careful attention to the Local Plan's design policies, Development Management policies <sup>2</sup> , the provisions of any possible future Town Centre Regeneration Plan, Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development in the town centre and urban areas.
<b>S4</b>		Suggested Inclusion	<b>DRAFT POLICY S4: Delivery of development and regeneration within the Guildford urban areas</b>
			Coordination of development in urban areas
	(1)	Suggested Inclusion	Enabling infrastructure will be supported in the urban areas where it helps to relieve existing problems, enable development and improve the environment in the urban by reducing or removing vehicles and/or supporting other modes of transport.  Enabling infrastructure will be supported in the Guildford

<sup>2</sup> The Development Management DPD has not yet been published in its first draft for consultation and the NPPF 153 notes that: "153. Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified." It cannot be appropriate to have a policy and verbiage in the Local Plan that refers substantially to a future DPD that has not formed part of the Local Plan but that is signposted in the Plan.

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Policy	Paragraph	Action and Comment	Proposed Text
			Urban Area where it helps to relieve existing problems, enable development and improve the social, economic and natural environment in those areas.
	(2)	Suggested Inclusion	<p>Development proposals will be encouraged to seek opportunities to enable the future development potential of adjacent sites. In this regard:</p> <ul style="list-style-type: none"> <li>(c) Submissions for planning permission will be required, where appropriate, to demonstrate consideration of surrounding properties and their development potential as part of reflecting on the wider design context of the scheme;</li> <li>(d) Where proposals undermine such development potential, they will be refused.</li> </ul>
	(3)	Suggested Inclusion	The Council recognises that the Exceptional Circumstances required to release sites in the Green Belt [specify these?] and will bring forward urban area sites to demonstrate the amount of unmet need to be accommodated in the Green Belt, taking full account of its duty to co-operate with other authorities, agents, stakeholders and community groups.
	(4)	Suggested Inclusion	Non-allocated sites in the Guildford Urban Area (excluding Guildford Town Centre), where the Government-published Indices of Multiple Deprivation show there are specific needs that can be met through positive planning, master planned development of sites exceeding 1Ha will be encouraged for a mix of uses to heights up to five stories, principally residential,

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Policy	Paragraph	Action and Comment	Proposed Text
			where it can be shown that those uses will contribute to resolving the identified issues.
			More efficient use of land and the acceleration of housing delivery
	(5)	Suggested Inclusion	The inclusion of residential development as part of mixed-use schemes will generally be supported.
	(6)	Suggested Inclusion	Schemes that seek to make more efficient use of land for housing development, including as part of mixed-use schemes, will generally be supported. Active ground floor uses will be encouraged on busier streets.
	(7)	Suggested Inclusion	In seeking to achieve more efficient use of land and/or accelerated housing delivery, the Council will where appropriate utilise mechanisms such as its compulsory purchase powers.
			Reasoned justification
	4.1.25	Suggested Inclusion	Whilst the Council will play a key coordinating role aimed at achieving delivery of development and regeneration, the Council expects the private sector to be central to this process. It is important that schemes that seek planning permission are conceived and designed in a manner that considers regeneration opportunities beyond the boundaries of the site. Collaboration between adjacent and surrounding property owners in the Guildford town centre, including efforts that seek to maximise regeneration opportunities

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Policy	Paragraph	Action and Comment	Proposed Text
			through mutually supportive design elements, uses and access arrangements are supported.
	4.1.26	Suggested Inclusion	Where the private sector does not or will not bring forward schemes that make the most of opportunities to regenerate both places and spaces, the Council will, where appropriate, use its statutory powers to bring about master-planned development.
	4.1.27	Suggested Inclusion	The Council regards the Urban area as critical in terms of meeting needs for new housing opportunities. Whilst the Local Plan has allocated sites for a wide variety of homes, as part of regeneration efforts more housing is likely to come forward over the plan period. It is important that this occurs in a manner that makes the most of its location and is thus developed at a density that is appropriate, bearing in mind design and flooding considerations.
<b>H2</b>		<b>Affordable Homes</b>	
		This policy needs to reflect town centre housing policies (suggested by proposed changes to Policies S2 and S3) and viability	
<b>P2</b>		<b>Green Belt</b>	
		This policy needs to make clear that a key purpose for Green Belt land in Guildford Borough is to assist in urban regeneration, by encouraging the recycling	

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Policy	Paragraph	Action and Comment	Proposed Text
		of derelict and other urban land.	
<b>P4</b>		<b>Flooding, flood risk and groundwater protection zones</b>	
		This policy needs to refer to flood protection policies in the Town Centre section where master planning can generate improvements and increased resilience whilst bringing forward an increase in town centre development.	
<b>P5</b>		<b>Thames Basin Heaths Special Protection Areas</b>	
		This policy needs to refer to town centre housing as a specific policy area where mitigation measures will need to be assessed on their own merits for its impact on Thames Basin Heaths Special Protection Areas	
		<b>Economy Policies</b>	
		<p>General Introduction</p> <p>There is no intrinsic need for additional retail employment at the expense of other employment uses – retail employees typically have the lowest GVA contribution. More retail employment would also introduce yet more near-minimum-wage employees for whom these are very few local</p>	

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Policy	Paragraph	Action and Comment	Proposed Text
		affordable homes.	
<b>E1</b>		<b>Meeting employment needs</b>	
	Policy (5) (a)	Guildford Town Centre Employment Core – needs to be in town centre policies.	
	Policy (7) (f)	Woodbridge Meadows – needs to be in the Guildford Urban Area policies.	
	Policy (7) (g)	Midleton Road Industrial Estate – needs to be in the Guildford Urban Area policies (note, GBC are expected to begin demolishing units on this estate imminently, having terminated leases).	
		<p>Suggested Addition-</p> <p>Policy E1 needs to allow for displacement from town centre sites where they meet the criteria for supporting high-trip-generating uses.</p> <p>The reason and justification for this is to support the master-planning, regeneration and redevelopment of the town centre and Guildford Urban Areas</p>	
	4.4.9	Amendment –	

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Policy	Paragraph	Action and Comment	Proposed Text
		This needs rewording to reflect the notion of displaceability of employment uses to locations that can handle high-trip-generating uses, and where there are good public transport connections.	
<b>E2</b>			
		This policy needs to be revised to change the effect of the sequential approach.	
	4.4.15	This needs to include areas served by the Sustainable Movement Corridor	
	4.4.18	Bus Station – this should be much clearer as a definition than (broadly) wherever it is that we decide to put it.	
<b>E3</b>		<b>Location for new employment floorspace</b>	
		This policy needs to be reworked to allow for the displacement of employment to suitable sequential alternatives ONLY where they facilitate master-planned development. This also needs to allow for changes of use (including mixed uses) within the town centre and Guildford Urban Area as part of a master-planned town centre regeneration.	
		Retail & Service Centres  This needs to require updates of the retail NEEDS	

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Policy	Paragraph	Action and Comment	Proposed Text
		(rather than demand) study to be provided at least every two years.	
<b>E6</b>		<b>The leisure and visitor experience</b>	
		This policy and supporting text needs a paragraph focused on town centre dwell time in support of leisure and amenity and retail	
<b>E7</b>		<b>Guildford Town Centre</b>	
		<p>This policy needs to be moved to town centre policies.</p> <p>Overall the policies need to reflect the notion that, of the total retail identified in the evidence base, [the amount net of 41,000 sqm] represents the maximum amount of retail inside the town centre. If demand is not met inside the town centre, it will not be permitted outside the town centre.</p> <p>The town centre policy also needs to deal with the rapid fall off of quality from the iconic High Street northwards to North Street and beyond</p>	
<b>D1</b>		<b>Place Shaping</b>	
		There needs to be a part of the town centre policy that includes public realm, improved pedestrianisation, etc., including a clear statement	

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Policy	Paragraph	Action and Comment	Proposed Text
		<p>on town centre place-shaping such that new developments will be designed to an agreed Town Centre design guide and standards, and to a mass and scale that relates well to the remainder of the town centre, its heritage and setting, including views to and from the Area of Outstanding Natural Beauty.</p>	
<b>ID1</b>		<b>Infrastructure and delivery</b>	
		<p>The Infrastructure Delivery Plan (including Appendix C) needs to include town centre infrastructure – including a strategy for resilience in the town centre, especially to links between east and west Guildford.</p> <p>The Infrastructure Delivery Plan needs to provide for modal separation in the town centre, access to new development areas, measures to reduce traffic pollution (including an electric vehicle charging infrastructure), measures to improve the resilience of public transport infrastructure, and comprehensive flood risk management strategies.</p> <p>There also needs to be infrastructure to support significantly more residential units in the town centre</p>	

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Policy	Paragraph	Action and Comment	Proposed Text
	4.6.3	This paragraph needs to include town centre infrastructure as above.	
	4.6.5	Guildford Borough Infrastructure Delivery Plan needs to be amended to include town centre infrastructure as above.	
<b>ID3</b>		<b>Sustainable transport for new developments</b>	
	(3)	<p>The route of the Sustainable Movement Corridor need to be finalised in order for this policy to be relevant and implementable in the Local Plan – as it currently says “New development providing, contributing and/or close to the routes of the proposed Sustainable Movement Corridor in the Guildford Urban Area will have evidence of impact and regard to the Sustainable Movement Corridor Supplementary Planning Document” which has not yet been published, and which, if it requires any changes of use or impacts other infrastructure which may alter the designations and allocations in the Local plan (or their viability or deliverability) may be required to be a Development Plan Document, and this <b>should</b> have been completed before submitting the Local Plan.</p> <p>There should also be reference to pedestrian infrastructure in the town centre and mode separation, as well as a requirement for new town</p>	

## REP/17406209/002

Policy	Paragraph	Action and Comment	Proposed Text
		centre developments to be planned so that they contribute positively to modal shifts and, where possible, facilitate modal separation in the town centre and surrounds including minimising conflict between modes.	
	4.6.24	This paragraph highlights the fact that parts of this route are missing, which may cast doubt on the deliverability of key elements of the Plan itself.	