

Appendix 3 – EAB comments and responses

Gosden Hill Farm

Issue and any response given during meeting	Further response
<p>“Councillors expressed the views that traffic management and A3 access improvements were crucial as local roads were thought to be currently at full operating capacity. A detailed transport assessment to ascertain how traffic generated by this development would impact on the road network would accompany the planning application.</p> <p>Councillors expressed the view that an all movements junction of the A3 was required. They were advised that the site allocation policy in the adopted Local Plan: Strategy and Sites allowed for a deliberative process of consideration to be undertaken as part of the development management process of the potential opportunity to provide an all movements junction. A potential all movements junction was found to be unnecessary in previous work.”</p>	<p>The matter of the transport strategy for the site was considered by the Planning Inspector in his examination of the then proposed Local Plan: Strategy and Sites (LPSS). The LPSS, with modifications made, was found to be sound and was subsequently adopted.</p> <p>With regards to the requirement in the LPSS regarding the potential opportunity for an all movements junction, the council set out its justification for this in section 11.11.1 – 11.11.6 of its Response to Matters, Issues and Questions - Questions 1 - 11 (document GBC/LPSS/003a) (available via https://www.guildford.gov.uk/localplan/examination).</p> <p>The Planning Inspector in his report on the examination of the LPSS (March, 2019), identified that with respect to the all movements junction, '[i]t is appropriate that consideration is given to the issues at the time of any relevant planning application' and that the requirement, as modified, 'provides the basis for such consideration as part of the development management process, which would include the potential for land to be provided on site to form part of the future route of a connector road to facilitate the junction' (para 159).</p>
<p>“In response to concerns regarding issues relating to access to retail venues, the town centre and railway stations, the Board was advised that the local Park and Ride, SMC and proposed new station offered transport options and the site promoter, in making a planning application, would need to undertake a transport assessment and, in so doing, involve Surrey County Council as the Local Highway Authority and Highways England.”</p>	<p>The Planning Inspector’s findings regarding the transport strategy for the site are set out in paragraphs 158 and 159 of his report (available via https://www.guildford.gov.uk/localplan/examination).</p>
<p>“Further explanation was sought as to how the transport requirements of the Local Plan in relation to this site were derived.”</p>	<p>Section 5 in the Topic paper: Transport (GBC, 2017) provides an explanation of the transport planning workstream in the Local Plan-making process. The various studies and reports identified in section 5 are available in the evidence base for the LPSS</p>

	(available via https://www.guildford.gov.uk/localplan/examination).
“Housing delivery timescales were a concern and it was agreed that related checks would be made with Development Management regarding the introduction of specific development delivery timescales in planning permissions.”	When granting planning permission, the only condition related to delivery that meets the necessary tests (these are that set out in paragraph 55 of the NPPF) for inclusion are that the development commences by a certain date, otherwise the permission lapses. The standard length is three years however we have recently, with the agreement of the applicant, reduced this to one year and we will continue to seek to reduce the time for the implementation of the planning permission where appropriate. A site is considered to be commenced when a material operation in connection with the approved scheme has been undertaken, this could be creating part of the foundation of a building or creating the site access. There are significant costs associated with opening up a site and for this reason when a site has formally commenced the developer will usually begin construction. Whilst a phasing strategy will be submitted as part of the planning application for the larger sites, it is not possible to enforce a certain build rate or penalise developers if they do not construct the site in accordance with their original expectations. Ultimately developers need to be able to sell their houses and, given the costs associated with developing sites, will not build unless they are confident of achieving sales. This issue is common across all local planning authorities however there are no measures available to prevent this within the current legislative framework.
“Increased noise blight from the A3 was raised as an issue and it was noted that an acoustic survey would be undertaken at the site and that any necessary measures such as landscaping, tree planting and acoustic fencing would be implemented.”	These matters will be addressed as part of the planning as indicated.

Former Wisley Airfield

“Although the SDF planned that the development of the site would take the form of a sustainable community, there were concerns that it would lead to car dependency and increased traffic congestion in the area as it lacked close access to a railway station.”	One of the tests of soundness against which the LPSS was assessed by the Planning Inspector is that it enables the delivery of sustainable development in accordance with the NPPF. The spatial strategy for the borough, including the allocation of the site, is set in the adopted LPSS. The Planning Inspector’s findings regarding the transport strategy for the site are set
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	<p>out in paragraphs 184 to 187 of his report (available via https://www.guildford.gov.uk/localplan/examination). The Planning Inspector found that the requirements for new bus services and a new off-site cycle network, including to the stations, “would assist in mitigating the traffic impacts of the development” (para 186).</p>
<p>“The SDF was thought to lack information regarding sustainable off-site movement and travel” and “The Board agreed that further explanation of, and strengthening of references to, the off-site cycle network and bus services were necessary.”</p>	<p>In terms of reference to bus provision, the following wording has been added to paragraph 8.6 [of the draft SDF document]. “In providing a high frequency and generous hours of operation, bus services should connect the site to local services and facilities, enabling a real alternative to the private vehicle to be realised.”</p> <p>Regarding the scope of the cycle network, the council would expect that the starting point would be Surrey CC’s Guildford Local Cycling Plan (Surrey CC, undated circa 2015). Looking forward, GBC is preparing the Local Plan: Development Management Policies. The Council has recently consulted on the Issues, Options and Preferred Options (GBC 2020). The future cycle network is considered in the topic and preferred and alternative options <i>for Policy ID10 Achieving a Comprehensive Guildford Borough Cycle Network</i> in the consultation. The aim of the proposed policy is to achieve a comprehensive Guildford borough cycle network. The preferred option in the consultation involves updating the Policies Map in the Local Plan with a combination of the cycle network plan outputs from Guildford BC’s Route Assessments Feasibility Study for the Guildford urban area and Surrey CC’s Guildford Local Cycling Plan, particularly for the rest of the borough outside of the Guildford urban area.</p> <p>Further, it may be that public footpaths in the Public Right of Way network in the vicinity of the site could accommodate cyclists with appropriate upgrades which would help minimise conflict. This would need to be considered as part of the planning application process. Key connections present as part of the Public Right of Way network have been added to Figure 62.</p>
<p>“The proposed new four-form entry secondary school was anticipated to draw traffic into the site.”</p>	<p>The planning application process will include a transport assessment and will be subject to the policy tests in the NPPF and the Local Plan, specifically Policy ID3, sustainable transport in new developments.</p>
<p>“It was felt that the proposed density of 50-60 dwellings per hectare at the centre of the site, which was over the suburban average, would</p>	<p>The SDF SPD contains general and site-specific guidance regarding the importance of landscaping.</p>

benefit from landscaping, planting and screening to soften the transition from a countryside area to an urban site.”

Blackwell Farm

“A view was expressed that the SDF needed to be strengthened in terms of achieving sustainable transport, identifying open space requirements, promoting a green environment and securing well designed carbon neutral homes.”

The design principles, as set out in section 3 of the SDF, have been revised and strengthened, including now referencing mobility hubs and targeting the provision of bus priority. This has been accompanied by modified guidance to protect primary streets from being colonised by overspill parking, for instance by the street design incorporating parking bays, including those suitable for deliveries, appropriately landscaped.

It is worth bearing in mind that the LPSS sets out the local policy requirements, with the SDF SPD providing guidance.

Open space requirements are set in the Local Plan, and the Local Plan Development Management Policies reflects a preferred option for a policy which updates the current requirement. The SPD merely applies the open space requirement in an illustrative manner to the sites. Nevertheless, the SPD does include guidance on design aspects relating to green infrastructure (see D1) and building in sustainability (3.1). The forthcoming Climate Change, Sustainable Design and Construction SPD will provide more detail on achieving the Local Plan Policy D2 requirements including regarding new buildings achieving reductions in carbon emissions.

“The SDF could include clarification to show how the development could improve cycle links from the site, including nearby Christmas Pie trail.”

The Christmas Pie Trail has been added to the relevant figures. Further information has been added to all site-specific sections to highlight that developers could develop or contribute to new infrastructure or upgrade existing connections.

“It was suggested by councillors that the SMC should include a bus loop to access the proposed new Guildford West (Park Barn) station.”

At the meeting officers understood that there was an interest in the SDF showing a bus loop accessing the southern forecourt of the Guildford West (Park Barn) station, as opposed to the closest routing of the bus being on Occam Road.

	<p>The SDF does not seek to fix the route of the SMC off site. However, the council is now minded that buses and cyclists would be provided for via Occam Road (separate from Priestly Road which would be available for general traffic and further provision for cyclists from Blackwell Park), providing close interchange with the new Guildford West (Park Barn) station.</p> <p>The Council's initial thinking is that it may not be desirable and/or feasible for buses to deviate from Occam Road to access the southern forecourt given the space requirements that this would necessarily entail.</p> <p>The Council's Corporate Programmes Team is progressing the development of the proposal for this new railway station, following Network Rail's GRIP process. The Council has commissioned a GRIP 3/4 study, following the previous GRIP1 and GRIP2 stage work which has been accepted by Network Rail. The incorporation and the design of station facilities has been and will continue to be considered as planning for the station progresses.</p>
<p>"It was considered important that the required infrastructure was put in place when it was first needed."</p>	<p>Policy ID1 of the LPSS requires both that, at (3) 'When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key infrastructure, or otherwise alternative interventions which provide comparable mitigation' and, at (4), 'The imposition of Grampian conditions shall be considered as a means to secure the provision of infrastructure when it is needed. If the timely provision of infrastructure necessary to support new development cannot be secured in line with this policy, planning permission will be refused'.</p>
<p>"The SDF could be expanded to include mitigation and design guidance relating to the new access road and any residual harm to the Area of Outstanding Natural Beauty, possibly involving developer contributions."</p>	<p>Policy A27 in the LPSS, sets requirements that the design of the access road, including its junction, will be sympathetic to its setting within an adjacent to the AONB and within the AGLV, and for mitigation measures to reduce the landscape impact. Once the detail of the new access road is developed, a clearer assessment of any residual harm and potential mitigation will be undertaken and be dealt with through the planning application process. The site allocation area was increased as a result of</p>

	independent examination of the Local Plan in order to allow for an appropriate design solution to be developed.
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Land to the South of Ash and Tongham

<p>Figure 53 provided an indication of areas of differing character and included elements of 'radiating landscape structure' centred on Ash Manor. Proposals were expected to demonstrate how they responded to the current site including elements of landscape structure. The illustration of the landscape structure, although indicative in extent, should be considered in the light of planning permissions granted. Further clarity could be provided in this regard.</p>	<p>The point made regarding consideration of permissions granted has been addressed by means of a modification to 7.1.1 to provide further clarity. It now reflects that '...parts of this site have already been granted planning permission and/or commenced. Consideration of the SPD should occur with an up to date view on development that has been granted permission and commenced.' Furthermore, whilst the figures are illustrative, they have been checked for internal consistency. As a result, a modification was made to the Figure: Development character with the radiating landscape structure depiction adjusted to more closely reflect the development areas / open space as per Figure 49: Illustrative application of the development principles to the site.</p>
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General

<p>The introduction of 20 mile per hour speed limits in the new developments on the strategic sites was suggested. Although the Local Highway Authority had previously had a limited appetite for introducing 20mph speed limits or zones, Planning Policy could be requested to investigate the matter further with respect to this and other strategic sites.</p>	<p>We have added a reference to low speed environments to paragraph [3.3.21] of the draft SDF.</p>
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