

**Briefing note - Borough, Economy and Infrastructure Executive Advisory Board
20/04/2017**

1. Introduction

1.1 A 6-week consultation period was undertaken for the Regulation 19 Proposed Submission Local Plan: strategy and sites ("Reg 19 Local Plan") in June/July 2016¹. The draft plan outlined the spatial development strategy for the borough and set out the level and location of development based on the objectively assessed need (OAN) for new homes, employment and retail space and an assessment of whether this quantum of development can be provided in a sustainable way following consideration of other policy constraints. The plan also included policies for the protection and enhancement of our environment, the provision of appropriate infrastructure to support the planned growth of the borough and the promotion of sustainable transport.

2. Previous Regulation 19 consultation

2.1 During last year's consultation, we received approximately 32,000 comments from approximately 6,000 individuals and bodies. We have since processed and assigned all the comments to the appropriate section of the plan or evidence base, and analysed them to understand whether they necessitate a change. We have also redacted all inappropriate comments and have since published them via our online consultation system. All comments have been available to view since 22 February 2017.

2.2 There was ongoing concern regarding development in the Green Belt, a perceived lack of infrastructure provision to support development and the robustness of our evidence base. There were also some detailed comments in relation to the policy wording and site allocations.

2.3 As a result of the consultation comments and an updated evidence base, we consider it is necessary to make a number of changes to the draft Local Plan. Some of these changes are significant in nature and for that reason require further consultation. Following discussions with the Planning Inspectorate, we have also taken the opportunity to make minor changes so that the plan submitted for examination is the plan we wish to see adopted.

3. Further targeted Regulation 19 consultation

3.1 We adopted a new Local Development Scheme (LDS) on 21 February 2017. This document sets out the stages and timetable for plan preparation. It indicates that in order to undertake a further Regulation 19 targeted consultation, the timetable has slipped by exactly one year. We propose to undertake the additional consultation for a period of 6 weeks in June/July 2017. Following this consultation, we will review all the comments made to ensure that the Local Plan we submit to the Secretary of State is sound. The LDS indicates that we hope to submit in December 2017.

¹ In accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012

3.2 The forthcoming consultation supplements and is in addition to the Reg 19 Local Plan (2016) consultation. All comments made to the previous consultation, alongside the comments from this summer's consultation, will be submitted to the Planning Inspectorate for examination. For this reason, we will only be considering comments that relate to parts of the plan or evidence base that have changed since the last consultation. All comments made last year to the parts of the plan that have not changed are still relevant and therefore do not need to be resubmitted as part of the forthcoming consultation. We have sought advice from the Planning Inspectorate who has advised us that comments made to parts of the plan that are unchanged should be considered not duly made. We will ensure that communications surrounding the consultation are clear to ensure that there is understanding regarding the purpose and remit of this summer's Reg 19 consultation.

4. Updates to the evidence base

4.1 We have updated and added to our evidence base as follows:

- West Surrey Strategic Housing Market Assessment (SHMA) Guildford Addendum: this sits alongside and supplements the West Surrey SHMA (2015). It provides a factual update for Guildford to include consideration of the latest population and household projections, the latest economic projections and the latest mid-year population estimate. The document is available to view at: www.guildford.gov.uk/newlocalplan/16277
- Employment Land Needs Assessment (ELNA): this updates the previous ELNA (2015) with the latest full set of post-Brexit economic projections. These projections have also fed into the SHMA addendum. The document is available to view at: www.guildford.gov.uk/newlocalplan/economy
- Retail and Leisure Needs Study Addendum: this sits alongside and supplements the Retail and Leisure Study update 2014. It provides a factual update to include the latest population projections and Experian forecasts. The document is available to view at: www.guildford.gov.uk/newlocalplan/economy
- Travellers Accommodation Assessment (TAA): this updates the previous TAA (2012) and takes account of recent changes in legislation. The document is available to view at: www.guildford.gov.uk/newlocalplan/16277
- Water Quality Assessment: this has been prepared to address comments raised by the Environment Agency. This document will be available in time for the consultation.

4.2 To understand the implications of changes to the draft Local Plan we are also reviewing and updating the Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). To help inform this process we are undertaking an Air Quality review. We will also be updating the various topic papers² we prepared to supplement last year's consultation. Each topic paper focuses on a particular theme and sets out the relevant considerations and justification for the approach taken in the Local Plan. They will help explain where there have been changes and justify any new approach. These documents will all be available in time for the consultation.

² Available online at: www.guildford.gov.uk/newlocalplan/topicpapers

5. Changes to policies

5.1 As a result of the SHMA addendum, the plan period has been rebased to the latest mid-year population estimate and rolled forward by one year to ensure 15 years at the date of adoption (2015 – 2034). The plan period is therefore now 19 years whereas previously it was 20 years. Policy S2 which sets out the spatial strategy for the borough has been updated to reflect the revised needs figures in the evidence base and a reconsideration of sites. The table below summarises the change in growth requirements between the two iterations of the plan.

	2016 Reg 19 Local Plan (2013 – 33)	2017 Reg 19 Local Plan (2015 – 34)
Housing	13,860	12,426
Office and research and development floorspace	37,200 – 47,200 sq m	36,100 – 43,700 sq m
Industrial employment land	4.7 – 5.3 hectares	3.7 – 4.1 hectares
Comparison retail floorspace	46,955* sq m	41,000 sq m**
Gypsy and traveller pitches	73 pitches	58 pitches
Travelling Showpeople plots	8 plots	8 plots

*due to uncertainties in forecasting over the longer term we're proposing to meet needs to 2029

**due to uncertainties in forecasting over the longer term we're proposing to meet needs to 2030

5.2 The remainder of the policies have undergone changes too. Appendix 1 provides a brief summary of the key changes to each policy and Appendix C: Infrastructure Schedule.

5.3 Some of the policy changes have been significant and include:

- additional requirements to the policy (e.g. requiring a proportion of accessible, adaptable and wheelchair accessible homes in Policy H1)
- Clarification on how the policy will be applied (e.g. replacement of 'we will expect' with 'will be required' in Policy ID3)

5.4 However, most are relatively minor changes that do not alter the intention of the policy but:

- improve readability or clarity
- ensures greater consistency between the policies
- responds to specific comments made during the last consultation

6. Changes to site allocations

- 6.1 The Reg 19 Local Plan (2016) site allocations excluded any land that had been granted planning permission. A key change in the Reg 19 Local Plan (2017) is that site allocations will now include sites with planning permission where these have yet to be commenced. The reason for doing so is to ensure that the policy context for these sites is clear should the permission expire. It provides greater certainty for the uses proposed on the site and our ability to count this as part of our supply. It is also more transparent for anyone looking at the plan to understand where growth is planned to occur.
- 6.2 The lower requirement for homes has been reflected in a number of site changes, including a number of sites that have been removed from the plan. We consider there are valid planning reasons for doing so, such as new evidence or a change in circumstance, which means they are not able to contribute towards meeting the unmet needs within the housing market area³. We outline below where there have been significant changes to the site allocations.

Site allocation A4: Telephone Exchange, Leapale Road, Guildford

- 6.3 The site was allocated for 100 homes. The Land Availability Assessment (LAA) acknowledged that the site was not available presently but identified it as having potential for redevelopment towards the end of the plan period given its location in the town centre. We have since had confirmation from the landowners of the site that, due to the current uses on the site and the cost of relocation, the site is not considered to be developable within the plan period.

Site allocation A6: North Street redevelopment, Guildford

- 6.4 The site was allocated for 45,000 sq m of comparison retail floorspace, 3,000 sq m of food and drink and 200 homes. To reflect the latest retail needs study and evidence of demand, the comparison retail floorspace has been decreased to 41,000 sq m whilst the food and drink element has been increased to 6,000 sq m. The housing capacity has also been increased to up to 400 homes with the caveat that should it be demonstrated that this overall scale of development cannot be appropriately accommodated on the site, the residential element will need to be reduced to ensure that retail needs are met.

Site allocation A18: Land at Guildford College, Guildford

- 6.5 The site was allocated for 100 homes. However, since the last iteration of the plan we have had confirmation from the site promoters that they are intending to progress a student accommodation scheme rather than one comprising of general homes. It is now proposed to be allocated for 200 student bedspaces.

Site allocation A29: Land to the south and east of Ash and Tongham

- 6.6 The overall scale of growth in this strategic location for development has remained consistent but the capacity of the allocation has been increased from 1,200 to 1,750 homes. The site allocation now includes the various planning permissions in this area

³ There is currently identified unmet housing need of 3,150 homes (2013/14 – 2026/2027) as a result of a shortfall in Woking Borough Council's planned supply in their adopted Core Strategy (2012) when assessed against their OAN of 517 homes per year (2013 – 2033)

that have not yet commenced due to the current unavailability of sufficient Suitable Alternative Natural Greenspace (SANG).

Site allocation A34: Broadford Business Park, Shalford

- 6.7 This site was allocated for 100 homes. Since the last iteration of the plan we have reconsidered how we intend to best meet both housing and employment needs. Given the loss of employment sites to housing that has already occurred due to permitted development rights, which is expected to continue, we are concerned at our ability to provide sufficient and varied office floorspace. Broadford is an established business park and, whilst not sequentially preferable, is considered suitable given our inability to identify sufficient sequentially preferable sites. The vast majority of our office floorspace is proposed to be allocated on the extension to the Surrey Research Park – retention of Broadford will help provide a variety and mix of floorspace.

Site allocation A36: Hotel, Guildford Road, East Horsley

- 6.8 This site was allocated for 48 homes. It was the subject of a recent appeal for the loss of the hotel and redevelopment for up to 49 dwellings. As part of this process, the inspector concluded that insufficient evidence had been prepared to justify the loss of the hotel. For this reason, it is considered that the site should be removed from the plan and the hotel use on it continue to be protected until such time as further evidence is presented that satisfactorily demonstrates that the loss would be in accordance with current planning policy.

Site allocation A41: Land to the south of West Horsley

- 6.9 This site was allocated for 90 homes. Through the consultation process, it has become known that the landowner of a significant part of the site has proposed to gift the land necessary to relocate the existing Raleigh School and associated playing fields onto this site.
- 6.10 At present, there is considerable uncertainty regarding the deliverability of this proposal. We therefore consider that there are not the exceptional circumstances that justify removing this site from the Green Belt and allocating it for the relocated school. Should there be greater certainty in the future then this could be progressed outside of the Local Plan through the planning application process accepting there is the requirement to demonstrate very special circumstances.

Site allocation A43: Land at Garlick's Arch, Send Marsh Burnt Common and Ripley

- 6.11 The site was allocated for 400 homes and 7,000 sq m of industrial land. Given concerns raised during the consultation process regarding the appropriateness of allocating a site for both housing and industrial uses, we have removed the industrial element from this allocation. The Travelling Showpeople plots that have been lost as a result of the removal of site allocation A46 (discussed below) is now proposed to be met on this site.

Site allocation A46: Land to the south of Normandy and north of Flexford

- 6.12 This site was allocated for 1,100 homes, six Travelling Showpeople plots and a mix of other uses. It is a high sensitivity Green Belt site which was only proposed to be

allocated previously on the basis of its ability to provide the secondary school required to meet the development needs arising in the west of the borough. Since the previous consultation, the promoters of Blackwell Farm have now confirmed that they are willing to provide a secondary school on their site. Blackwell Farm is a preferable location in relation to both school place planning and sustainability perspectives, and was only discounted previously on the basis that the site was not available for education provision.

- 6.13 Given the site consists of the whole land parcel assessed to be high sensitivity Green Belt, the allocation of this land would result in significant harm to the Green Belt. However great weight was given to allocating a site that could provide an eight form entry secondary school in the west of the borough. Whilst there would continue to be some sustainability benefits associated with the allocation of the site in relation to additional services, given the other harm we do not consider that this is justified without the benefits associated with the provision of the secondary school.

Site allocation A47: Land to the east of the Paddocks, Flexford

- 6.14 This site was allocated for 50 homes. Since the consultation, it has been resurveyed and is considered to still be worthy of a Site of Nature Conservation Interest (SNCI) status. This is due to the semi-improved grassland habitat which is not compatible with development. Given this habitat has declined dramatically across the country, it is considered important and worthy of continued designation and protection.

Site allocation A48: Land at Home Farm, Effingham

- 6.15 This site now has planning permission for six rural exception traveller pitches, which are now under construction. It is therefore no longer necessary to allocate this land however the site is still being counted as part of our supply.

Site allocation A58: Land around Burnt Common warehouse, London Road, Send

- 6.16 This is a new site which is proposed to be allocated for the 7,000 sq m of industrial land previously proposed on site allocation A43: Garlick's Arch. This site is adjacent to an existing industrial use and is in a less sensitive location to accommodate the proposed uses on its site.

Site allocation A59: New rail station at Guildford West (Park Barn)

- 6.17 A new rail station at Guildford West was included in Appendix C: Infrastructure Schedule in the Reg 19 Local Plan (2016). To aid clarity and to provide a degree of certainty, the site has been included as a site allocation within the Reg 19 Local Plan (2017).

Delivery on strategic sites within the plan period

- 6.18 Since the consultation of the Reg 19 Local Plan (2016), we have also reconsidered the delivery profile for our strategic urban extensions around Guildford, namely Blackwell Farm and Gosden Hill. One of key reasons for the 14% buffer in the Reg 19 Local Plan (2016) was to ensure delivery of our housing target should these sites not deliver in full during the plan period. There was always some uncertainty regarding the delivery rates assumed on these sites given their dependency on the Road Investment Strategy scheme for the improvement of the A3 Guildford and the

expected timescales for implementing it. Upon reflection, and through continued discussions with the site promoters, we consider that a more robust approach would be to assume more realistic phasing with delivery of part of these sites beyond the plan period. Doing so also justifies a reduction in the buffer (14% down to approximately 10%) as there is less uncertainty in relation to our ability to meet our housing requirement compared to the previous plan which was based on (more optimistic) delivery assumptions.

- 6.19 This phased approach follows a similar one already taken at Slyfield Area Regeneration Project (SARP) in the Reg 19 Local Plan (2016). This assumed delivery of 1,000 homes within the plan period whilst the overall site capacity is approximately 1,500 homes. Whilst there is greater certainty in relation to our ability to deliver our revised housing requirement, we still consider a buffer of 10% is robust and demonstrates that the plan has sufficient flexibility to adapt to rapid change, as required by paragraph 14 of the NPPF.
- 6.20 It is worth noting that assuming a longer phasing profile on these sites beyond 2034 does not reduce our supply in the early years of the plan period. It is also important to note that whilst we are assuming a more conservative and realistic delivery rate in our housing trajectory, we are not attempting to artificially constrain each site's delivery should the market and the necessary infrastructure improvements enable them to be built earlier. For this reason, they are still proposed to be allocated for their full capacity with the associated level of infrastructure requirements rather than being designated as 'safeguarded' land, which would require a Local Plan review to bring forward the additional land.
7. Changes to maps
- 7.1 There are a number of maps which have also changed, either as a result of changing circumstances, correction of errors or changes to site allocations. Appendix 2 provides a brief summary of the key changes to each map.

Appendix 1 - summary of key changes to the policies and Appendix C

This note provides a brief summary of the changes to the policies and Appendix C: Infrastructure Schedule. Some of the policy changes have been significant and include:

- additional requirements to the policy (e.g. requiring a proportion of accessible, adaptable and wheelchair accessible homes in Policy H1)
- Clarification on how the policy will be applied (e.g. replacement of 'we will expect' with 'will be required' in Policy ID3)

However, most are relatively minor changes that do not alter the intention of the policy but:

- improve readability or clarity
- ensures greater consistency between the policies
- responds to specific comments made during the last consultation

Policy S1: Presumption in favour of sustainable development

- Added wording to introduction to reflect para 14 of NPPF
- Added definition of sustainable development
- Added in reference to the specific policies referred to in the NPPF that indicate development should be restricted

Policy S2: Planning for the borough - our spatial development strategy

- Correction to include urban extension at Ash and Tongham in Countryside Beyond the Green Belt bullet
- Defined the strategic development sites to aid clarity
- Amended plan period and quantities of the new requirements for homes, employment, retail and travellers
- Will be amending the annual housing target/phasing of development (**note:** this will only be done for Executive but does not impact on the quantum of development contained within the plan)
- Additional wording to provide greater clarity regarding the overall housing requirement, the purpose of the annual housing target table, the rolling five year housing supply and the specific site allocations
- Additional justification for the phasing strategy
- Reference to the 'latest' LAA for information on supply over the plan period
- Deletion of Table 1 – this information will be contained in the latest LAA. Not necessary to be contained in the Local Plan
- Table 2 (hierarchy of centres) – this has been moved to Appendix B to sit alongside the primary and secondary shopping frontages table
- Monitoring indicators amended to reflect that relevant floorspace will be monitored by policies E1 and E7

Policy H1: Homes for all

- Clarification that the net loss of all housing will not be permitted and the net loss of C2 use class (residential care/nursing homes), C3 dwellings and traveller sites (including sites allocated as such in Local Plan) will not be permitted
- Moved density wording to policy D4 'Character and design of new dwellings'

- New policy wording requiring 15% of new homes on schemes of 25 homes or more to be accessible, adaptable and wheelchair accessible homes. Clarification in reasoned justification
- The 'encouragement' of specialist accommodation
- Rewording to encourage new purpose built student accommodation on campus for all higher education Guildford based students, where appropriate. About 60% of full time Guildford based University of Surrey students expected to be provided with accommodation on campus. Clarification in reasoned justification
- Reworded policy to state that sufficient traveller sites are identified in Local Plan to meet needs. Deleted some wording in traveller policy to make it compatible with our approach to all housing. Clarification in reasoned justification
- New wording in response to recent legislation to require self-build or custom housebuilding plots on development sites of 100 or more homes, to be delivered at the earliest stages. Plots to respond to the sizes identified on the register and to be appropriately priced and marketed for 18 months. Clarification in reasoned justification

Policy H2: Affordable Homes

- Softening of introductory text in relation to reasons for affordability issues in the borough
- First para of policy replaces text previously below in a bullet point to aid clarity
- Text of policy tone changed from 'will be provided' to 'seeking'. More in line with the consideration of viability and the process of negotiation
- Tone of text changed in relation to must be to 'seeking'. As reason above. Development would not be unacceptable if it delivered less than 40% for genuine reasons of viability
- Size of homes clarified to relate to the number of bedrooms
- By providing affordable housing on site developers will not be providing land at nil cost or any other cost
- Incorporate paragraph addressing off site contributions in policy. Was previously only in the accompanying text
- Para 4.2.40 tidied up – removed reference to cascade as superfluous

Policy H3: Rural Exception Homes

- Clarified wording in policy
- Removed detail about the allocation policy – this is determined through the Council's allocation policy

Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value

- Policy title changed to refer to the Area of Great Landscape Value
- Removal of "we" where appropriate
- Addition of reference to scenic beauty and deletion of bulleted considerations to ensure consistency with NPPF/NPPG requirements
- Rewording of reference to exceptional circumstances test to make clearer and refer to national policy rather than NPPF to future proof it
- Addition of reference to natural beauty to reflect Natural England's guidance for AONB
- Addition of reference to protection of its setting to reflect NPPG
- Removed repetition in Reasoned Justification

- Removal of reference to the date at which we expect Natural England to undertake boundary review as this may be subject to change. Now says its within their current work programme

Policy P2: Green Belt

- Send Business Park is now inset from the Green Belt
- Removal of “we” where appropriate
- Correction of term ‘proposals map’ to ‘policies map’
- Addition of Ripley as a village which, whilst the majority continues to be inset from the Green Belt, now also has an identified settlement boundary for limited infilling purposes
- Monitoring changed to percentage to measure success of policy

Policy P3: Countryside

- Restructure of wording and repetition removed
- Reference added to the policies map to make clear it only applies to designate countryside rather than all countryside which includes Green Belt land
- Monitoring changed to percentage to measure success of policy

Policy P4: Flood Risk

- Title of Policy amended as suggested by the EA
- Introductory text making connection with the NPPF
- Clarification of 3b undeveloped land contribution to flow routes
- Greater recognition of climate change over the lifetime of new development throughout policy and reasoned justification
- Further reference to surface water land drainage
- Updating of evidence documents

Policy P5: Thames Basin Heaths Special Protection Area

- New text added to the introduction to reference relevant international legislation and treaties other than EU directives to provide a more complete picture of the legal background to SPA protection, as suggested by SWT
- First sentence of policy reworded to be positive to meet NPPF requirements with no consequential negative impact on the strength of the policy
- Clarified the relationship between avoidance and mitigation throughout the policy, as suggested during the consultation
- Corrected the threshold for impact in the 5-7 km zone is development of “over” 50 net new dwellings (not “at least” 50). This reflects the situation
- Clarified that new SANG proposals must be “agreed” by NE, not “approved”, which was misleading
- Added a definition of “adverse impacts” after the policy and how this interacts with the SPA approach introduced in 2010. This aids clarity following consultation comments
- Replaced the list of types of residential development and permanent accommodation. This represents further work undertaken on the emerging SPA Strategy since the policy was written
- Removed requirement in the supporting text for all development in 400m zone to undergo an Appropriate Assessment as Natural England disagreed with this

- Added a short paragraph explaining that the policy must be consistent with policy NRM6 of the South East Plan, following solicitor's advice.

Policy E1: Meeting employment needs

- Introductory text – new paragraph on role of LEP.
- Amount of floorspace amended in light of new ELNA.
- Reference to the number of strategic sites has been removed as considered unnecessary
- Three Office and R&D strategic sites added to list:
 - 1000, 2000 and 3000 Cathedral Hill previously included within another site
 - The Guildway previously incorrectly listed as industrial
 - Send Business Centre has been added to the plan
- Clarity added to Gosden Hill Farm designation
- New designation of Strategic Industrial site at Burnt Common added
- Site at Garlick's Arch deleted .
- Locally significant sites
 - Words "employment based" added to regeneration for clarity
 - Broadford Business Park added now it is not being lost for residential
 - Abbey Business Park and Home farm following feedback from Rural Business Officer
 - New future employment land at Wisley added

Policy E2: Locations of new employment floorspace

- Amended wording on Guildford town centre to clarify sequential approach.
- Deleted wording on Surrey Reach Park and amended to apply to all site allocations to simplify and clarify text.
- Added "Locally Significant Employment Sites" as a location where development is acceptable in order to ensure policy in conformity with policy E3.
- Industrial – text added to ensure policy in conformity with site allocations.
- Definitions – Transport interchanges – Wanborough removed and Normandy/Flexford site removed from Plan.
- Text on Waste Management Facilities added at the request of SCC.

Policy E3: Maintaining employment capacity and improving employment floorspace

- Text added on Strategic Employment Sites will be protected for their current specific use. To ensure the balance is maintained of both office/R&D and Industrial in order to meet needs.
- Text added to clarify that marketing must take place prior to submission of a planning application.
- Additional information added to ensure marketing information is fully clarified and easy to understand.

Policy E4: Surrey Research Park

- Text amended on vacant plot at Faraday Court to ensure information is up-to-date.
- Added reference to proposals map and site allocation to ensure Plan is consistent throughout.
- Moved bullet on design and landscaping to clarify that this applies to all proposals not just exceptions to the first paragraph
- Added text on total capacity vs plan period

Policy E5: Rural Economy

- Added text on small incubator units as a result of consultation responses and discussions with Economic Development team
- Added text on agricultural land as a result of consultation responses
- Added text on loss of shops and services to ensure policy is consistent with E8 and to ensure this key requirement is not lost if applicants only look at policy E5
- RJ – added text from previous draft on broadband as a result of consultation responses
- Added text on small incubator units as a result of consultation responses, councillor comments and discussions with Economic Development team

Policy E6: The leisure and visitor experience

- Updated statistics
- Introduction now makes reference to the historic built environment, centres, natural environment, biodiversity and water quality
- Policy wording changed from 'should' to 'require'
- Increased flexibility in terms of locational requirements for self-contained hotels

Policy E7: Guildford Town Centre

- Added references to historic assets and character
- Enhanced reference in text to high quality design and environmental standards. Also reconnecting the town to the river
- Moved policy heading to add para to introduction
- Deletion of the vision, which came from the Town Centre Masterplan
- Removal of text from first part of policy that were none specific and added them as text
- Corrected error of leaving out reference to A5 use in policy
- Update quantum of development proposed in response to changes to the evidence base
- Deletion of text relating to flooding as it unnecessary text within a Local Plan. Does not aid understanding of the policy or help the decision maker
- Updating of the Key evidence removing the Town Centre Masterplan
- Amended Monitoring indicators to read floorspace permitted and completed within the town centre

Policy E8: District Centres

- Removal of 'we' as inappropriate
- Clarify the relationship between the Primary Shopping Area and the District Centre. The NPPF requires Primary Shopping areas to be defined
- Expand those uses that will be supported in the centre beyond just retail uses to include other main town centre uses
- Correct an error re reference to local centres in a policy on District centres
- Simplify wording in relation to the A uses
- Ensure consistency in the 4 bullet points with policies E7 and E9
- Add two new sentences clarifying changes of use from A2-5 to other town centre uses at ground floor level and confirm this does not include residential use or Office use
- Add definition of 'main town centre uses' to Reasoned Justification

Policy E9: Local Centres

- Remove the 'we' as inappropriate

- Clarify the relationship between the Primary Shopping Area and the District Centre. The NPPF requires Primary Shopping areas to be defined
- Expand those uses that will be supported in the centre beyond just retail uses to include other main town centre uses
- Simplify wording in relation to the A uses
- Add two new sentences clarifying changes of use from A2-5 to other town centre uses at ground floor level and confirm this does not include residential use or Office use
- Last sentence of policy moved to more appropriate policy E5
- Definition section enhanced with definition of main town centre uses, reference to defining the primary shopping area(moved from Reasoned Justification) and defining small scale

Policy D1: Place shaping

- Policy title changed to better reflect aims of the policy
- Added reference to landscape considerations
- Use of “should” rather than “must” as not all bullets will be relevant in all cases
- Additional bullet seeking high quality communications infrastructure to support broadband
- The section of the policy and text in the reasoned justification that related to **all** developments has been moved to Policy D4: Character and design of new development
- Addition of Landscape Character Assessment to Key Evidence

Policy D2: Sustainable design, construction and energy

- Changed “must” to “are/is required to” to be consistent with other policies
- Removed “that are achievable” when referring to the highest standards as this is inherent in the policy (applicants cannot exceed achievable standards)
- Removed “wherever opportunities to do so are identified” from the requirement to “deliver measures that enable sustainable lifestyles for the occupants of buildings” in order to reduce uncertainty for applicants and deliver a plan-led system.
- Increased carbon reduction requirement from 15 per cent to 20 per cent subject to the outcome of the viability study currently underway
- Added a sentence to allow for offsite carbon offsetting measures as a last resort in meeting the carbon reduction requirement as GBC may wish to set up an offset fund in the future. This reflects the energy hierarchy
- Added clarifications on sustainability and energy statements, “direct carbon emissions” and “the lowest level of carbon emissions” to the supporting text for clarity
- Clarified that the “highest level of water efficiency” means the current optional building regulation standard of 110 litres per person per day, or a future higher national standard. This is to allow for changes in national policy and to ensure the current standard (110 litres per person per day) is formally adopted through this policy. Further explanation added to the supporting text
- Added clarification to the meaning of the requirements for CCHP systems to be of a scale and operation that delivers the lowest carbon emissions to provide greater clarity for the policy

Policy D3: Historic environment

- Replace word ‘conserve’ with ‘sustain’ on advice of Historic England
- Additional wording to reasoned justification on historic landscapes, County sites of archaeological importance and consulting the County Archaeologist on sites of archaeological importance

- Addition of Landscape Character Assessments and Historic Landscape Character Assessments to Key Evidence

Policy D4: Character and design of new development

- Policy title changed to better reflect aims of policy - no longer restricted to only urban areas and inset villages – applicable to **all** new development
- Text previously in Reasoned Justification added to introduction
- Section of policy and Reasoned Justification previously in D1 incorporated into D4
- Additional bullet regarding density and efficient use of land (previously addressed in Policy H1)
- Additional requirements from LP 2003 General Policies added eg designing out crime, inclusion of natural features such as watercourses and ponds, visual interest at pedestrian level, visual impact of traffic
- Additional requirement for the DCLG nationally described space standards
- Section of policy that related to inset villages now relates to **all** villages
- Reasoned Justification includes additional information in relation to art and the emerging GBC Public Art Strategy
- A number of additional documents added to the Key Evidence

Policy ID1: Infrastructure and delivery

- Policy tightened and expanded to aid clarity with regard to phasing and application of planning conditions and planning obligations
- The policy test included in the site allocation policies for the strategic sites starting 'When determining planning applications...' added to the policy
- Clarified the definition of infrastructure

Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"

- Clarified and modified application of the policy to 'promoters of sites close to the A3 and M25 and strategic sites...'
- Removed the square bracketed paragraph on the potential Statement of Common Ground as felt that this likely to be agreed closer to Examination
- Date source of 'Planning consents' removed from Monitoring

Policy ID3: Sustainable transport for new developments

- Policy tightened with replacement of 'we will expect' with 'will be required'
- Use of additional language mirroring NPPF
- Requirement for planning obligation preventing future occupants obtaining on-street residents parking permits now specified as applying to CPZs, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, 'pay and display' visitor parking exceeds the supply of designated on-street parking spaces
- Tightened requirement in other areas such that any development-related parking on the public highway does not adversely impact road safety or the movement of other road users
- New provision that the provision and/or improvement of a car club by a new development will be supported if appropriate
- Cumulative impacts test now specifically includes the context provided by site allocations as well as approved developments
- Infrastructure Schedule referenced in policy itself
- Policy added that the provision of additional public off-street car parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise drive through the Guildford gyratory

- Definitions added
- Reasoned Justification has undergone major update to reflect numerous policy changes

Policy ID4: Green and blue infrastructure

- Name of policy changed to ID4. Responds to consultation comment that I4 looks like fourteen. Other “I” policies have been renamed accordingly.
- Added allotments to list of types of green infrastructure as suggested in consultation.
- Added flood risk management to the list of benefits of Green Infrastructure as suggested in consultation.
- Numerous amendments to supporting text for clarity and accuracy
- Added “as defined in the NPPF” to definition of open space for clarity.
- Added “where possible” to requirement for proposals to demonstrate how they will achieve net gains in biodiversity to reflect language in the NPPF
- Added “Where this test is met, every effort must be made to reduce the harm to the site through avoidance and mitigation measures” to aid clarity
- Minor amendments to Blue Infrastructure section of the policy for clarity and accuracy
- Added “as identified in the most recent Open Space, Sports and Recreation Assessment” to final paragraph of policy
- Added text to definitions to allow for biodiversity enhancements other than those indicated in the BOA policy statements where they are more appropriate
- Changed references to “NPPF” to “national planning policy” for future proofing, where the text does not refer to a specific NPPF paragraph

Appendix C

- Options kept open through identifying ‘Developer funded’ as the funding source so that specific infrastructure schemes can be funded by S106 or CIL, and by one or many developers
- SRN1 and SRN6 highway schemes removed as requested by Highways England
- SRN7 and SRN8 highway schemes now shown as benefitting from committed funding from the Department for Transport
- LRN7 highway scheme now additionally specifies that developer of former Wisley Airfield site will provide a mitigation scheme to address junctions of Old Lane, Forest Road and Howard Road
- LRN17 highway scheme retained, but mention of this being principally to serve the Normandy and Flexford site removed as site has been removed from Draft Local Plan
- LRN19, AM4, EG6, WS4, WCT5, FRR4, FRR5, SANG13, OS4, PED1 infrastructure schemes removed as Normandy and Flexford site removed from Draft Local Plan
- LRN23 highway scheme added for new and modified signalised junctions of A322 Onslow Street, Laundry Road, A322 Woodbridge Road and A246 York Road in Guildford town centre
- BT5 and BT6 bus schemes added for significant bus networks serving Gosden Hill Farm and Blackwell Farm sites respectively to match additional requirements for their site allocation policies
- ‘SCC’ removed from the ‘Delivered by’ cell for various transport schemes as requested by SCC where it is considered that a specific developer will be responsible

- EYED1 early years education scheme removed – this site (site allocation A18 is now being allocated for student accommodation and an element of D1. Nursery no longer considered appropriate here)
- PED5 primary school scheme modified following discussion with SCC as Local Education Authority
- SED1 secondary school requirements at Gosden Hill Farm site modified – reference to up to 6FE removed as this is not necessary with 4FE at Wisley airfield
- SED2 secondary school requirements at former Wisley airfield site modified to remove reference to “age 16” at request of SCC
- SED3 secondary school requirements modified to such that school provided at Blackwell Farm site rather than the Normandy and Flexford site removed from the Draft Local Plan
- SED4 deleted – UTC project no longer being progressed
- SED5 secondary school requirement added for expansion of Ash Manor Secondary School
- Addition of HSC6 - GP provision at Ash and Tongham

Appendix 2 - summary of key changes to the maps

Guildford Urban Area

1. Removal of site allocation A4
2. Incorrect AONB layer
3. Change of designation
4. Additional site allocation (A59)

Guildford Town Centre

1. Removal of site allocation A4

Albury

No change

Ash and Tongham

1. Additional land parcels within allocation A29
2. Site boundary amendment to allocation A28
3. Urban area/Green Belt boundary amendment

Ash Green

1. Site boundary amendment to allocation A28
2. Urban area/Green Belt boundary amendment

Chilworth

No change

Compton

No change

East Clandon

No change

Effingham

1. Green Belt boundary amendment

Fairlands

No change

Former Wisley Airfield

1. Site boundary amendment to allocation A35
2. Green Belt boundary amendment

Gomshall

No change

Henley Business Park, Pirbright Road, Normandy

No change

HM Prison, Ripley Road, Ripley

No change

Holmbury St Mary

No change

Home Farm, Effingham

Removed

Horsleys – West Horsley (north)

1. Removal of site allocation A41
2. Amendment to Green Belt boundary

Horsleys – East Horsley (south)

1. Removal of site allocation A36
2. Removal of site allocation A41
3. Amendment to Green Belt boundary
4. Amendment to Identified Settlement boundary

Horsleys – East Horsley

1. Removal of site allocation A36
2. Removal of site allocation A41
3. Amendment to Green Belt boundary
4. Amendment to Identified Settlement boundary

Horsleys – West Horsley (south)

No change

Jacobs Well

No change

Keogh Barracks, Ash Vale

No change

Mounte Browne and University of Law, Guildford

No change

Normandy and Flexford

1. Removal of site allocation A46
2. Removal of site allocation A47
3. Amendment to Green Belt boundary

Peaslake

No change

Peasmarsh

No change

Pirbright

No change

Puttenham

No change

Ripley

1. Amendment to Green Belt boundary
2. Inclusion of Identified Settlement boundary

Send Marsh/ Burnt Common

1. Additional site allocation (A58)
2. Amendment to Green Belt boundary
3. Amendment to Green Belt boundary
4. Boundary amendment to site A43a
5. Boundary amendment to site A43
6. Designation of site as a 'Strategic Employment site'

Send

1. Designation change from 'Locally Important Employment site' to 'Strategic Employment site'
2. Amendment to Green Belt boundary

Shalford North:

1. Incorrect AGLV boundary

Shalford South:

1. Incorrect AGLV boundary
2. Removal of site allocation A34
3. Designation of site as a 'Locally Important Employment site'

Shere

No change

The Orchard, Puttenham

No change

The Pirbright Institute

No change

West Clandon

No change

Whittles Drive, Cobbetts Close and Four Acre Stables, Aldershot Road (Normandy and Worplesdon wards)

No change

Wood Street Village

No change

Worplesdon

No change